

START

0042596

**NOTICE OF INTENT
FOR EXPANSION UNDER
INTERIM STATUS**

**HANFORD FACILITY,
325 HAZARDOUS WASTE TREATMENT UNITS**

**U.S. DEPARTMENT OF ENERGY,
RICHLAND OPERATIONS OFFICE
SEPTEMBER 1995**

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METRIC CONVERSION CHART

The following conversion chart is provided to the reader as a tool to aid in conversion.

Into metric units

Out of metric units

If you know	Multiply by	To get	If you know	Multiply by	To get
Length			Length		
inches	25.40	millimeters	millimeters	0.0393	inches
inches	2.54	centimeters	centimeters	0.393	inches
feet	0.3048	meters	meters	3.2808	feet
yards	0.914	meters	meters	1.09	yards
miles	1.609	kilometers	kilometers	0.62	miles
Area			Area		
square inches	6.4516	square centimeters	square centimeters	0.155	square inches
square feet	0.092	square meters	square meters	10.7639	square feet
square yards	0.836	square meters	square meters	1.20	square yards
square miles	2.59	square kilometers	square kilometers	0.39	square miles
acres	0.404	hectares	hectares	2.471	acres
Mass (weight)			Mass (weight)		
ounces	28.35	grams	grams	0.0352	ounces
pounds	0.453	kilograms	kilograms	2.2046	pounds
short ton	0.907	metric ton	metric ton	1.10	short ton
Volume			Volume		
fluid ounces	29.57	milliliters	milliliters	0.03	fluid ounces
quarts	0.95	liters	liters	1.057	quarts
gallons	3.79	liters	liters	0.26	gallons
cubic feet	0.03	cubic meters	cubic meters	35.3147	cubic feet
cubic yards	0.76	cubic meters	cubic meters	1.308	cubic yards
Temperature			Temperature		
Fahrenheit	subtract 32 then multiply by 5/9ths	Celsius	Celsius	multiply by 9/5ths, then add 32	Fahrenheit

Source: *Engineering Unit Conversions*, M. R. Lindeburg, PE., Second Ed., 1990, Professional Publications, Inc., Belmont, California.

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1.0 INTRODUCTION

The Washington State Department of Ecology (Ecology) *Dangerous Waste Regulations, Washington Administrative Code (WAC) 173-303-281*, requires that dangerous waste facility owners and/or operators submit a Notice of Intent (NOI) before submittal of a permit application for new or expanded dangerous waste treatment, storage, and/or disposal (TSD) units on the Hanford Facility. The following information for this NOI is being filed with Ecology by the U.S. Department of Energy, Richland Operations Office (DOE-RL), the owner/operator of the Hanford TSD Facility.

This document is to serve notice of the intent to expand tank storage and treatment capacity of the Shielded Analytical Laboratory and of the proposed 325 Collection/Loadout Station Tank. The Shielded Analytical Laboratory and the proposed 325 Collection/Loadout Station Tank are part of the 325 Hazardous Waste Treatment Units in the 325 Building. The 325 Building is located in the 300 Area of the Hanford Facility, Richland, Washington.

The ability to store and treat liquid mixed waste in tanks is being added to ensure compliance with the greater-than-90-day storage requirements of WAC 173-303 and the *Resource Conservation and Recovery Act (RCRA) of 1976*, as amended.

The following identifies the owner and operator of the Hanford Facility and the primary contact:

Owner and Operator: U.S. Department of Energy, Richland Operations Office

Manager, Richland Operations Office: Mr. John D. Wagoner

Richland Operations Office Contact: Mr. James E. Rasmussen

Address: U.S. Department of Energy
Richland Operations Office
Post Office Box 550
Richland, Washington 99352

Telephone: (509) 376-5441.

2.0 FACILITY DESCRIPTION AND GENERAL PROVISIONS

The Hanford Facility is a single RCRA facility identified by the U.S. Environmental Protection Agency (EPA)/State Identification Number WA7890008967 that consists of over 60 TSD units conducting dangerous waste management activities. These TSD units are included in the *Hanford Facility Dangerous Waste Part A Permit Application* (DOE-RL 1988). The Hanford Facility consists of all contiguous land, and structures, other appurtenances, and

1 improvements on the land, used for recycling, reusing, reclaiming,
2 transferring, storing, treating, or disposing of dangerous waste, which, for
3 the purposes of the RCRA, are owned by the U.S. Government and operated by the
4 DOE-RL, excluding land owned by Washington State.

5
6 The following sections provide a description of the 325 Hazardous Waste
7 Treatment Units along with other general provisions specified in
8 WAC 173-303-281.

9 10 11 **2.1 LOCATION OF PROPOSED EXPANSION**

12
13 The 325 Hazardous Waste Treatment Units are located in the 325 Building
14 within the 300 Area of the Hanford Facility, Benton County, Washington.
15 Small-scale maps depicting the location of the 325 Hazardous Waste Treatment
16 Units are provided in Figures 1 and 2, respectively. Large-scale maps,
17 including a topographic map, which meet the 2.54 centimeter-equals-not-more-
18 than-61-meters requirement, are provided in Appendix A and include the
19 following:

- 20
21 • General Overview of the Hanford Site (H-6-958)
- 22
23 • Topographic map of the 325 Hazardous Waste Treatment Units, including
24 the surrounding 305 meters. There are no existing or planned
25 injection or withdrawal wells in the vicinity of the 325 Hazardous
26 Waste Treatment Units. There are no barriers planned for drainage or
27 flood control.

28 29 30 **2.2 DESCRIPTION OF THE UNIT TO BE EXPANDED**

31
32 The 325 Hazardous Waste Treatment Units are located in the 325 Building
33 within the 300 Area of the Hanford Facility. The 325 Hazardous Waste
34 Treatment Units consist of the following treatment, storage, and/or disposal
35 areas: Hazardous Waste Treatment Unit, Shielded Analytical Laboratory, and
36 the 325 Collection/Loadout Station Tank.

37
38 The Hazardous Waste Treatment Unit is located in the northeast corner of
39 the 325 Building (Figure 3). The Hazardous Waste Treatment Unit provides
40 treatment and storage of mixed waste and/or dangerous waste in approved
41 containers.

42
43 The Shielded Analytical Laboratory is located in the west side of the
44 325 Building (Figure 3). The Shielded Analytical Laboratory provides
45 analytical chemistry services within six interconnected hot cells to prepare
46 and analyze samples of mixed waste. The Shielded Analytical Laboratory also
47 is used for storage and treatment of mixed waste in approved containers.

48
49 The proposed location for the 325 Collection/Loadout Station Tank is in
50 the southeast corner of the basement of the 325 Building (Figure 4). The

1 325 Collection/Loadout Station Tank is proposed for storage and treatment of
2 mixed waste from various laboratory activities throughout the 325 Building.

3
4 The mixed waste and/or dangerous waste containers in the Hazardous Waste
5 Treatment Unit and Shielded Analytical Laboratory contain characteristic
6 waste, toxic constituents, non-specific source waste, selected waste from
7 specific sources, and state-only (extremely hazardous and dangerous) waste.
8 The estimated annual quantity of mixed waste and/or dangerous waste stored in
9 containers is approximately 9,500 kilograms and for container treatment is
10 2,500 kilograms. No container storage is proposed for the 325 Collection/
11 Loadout Station Tank pit area.

12 13 14 **2.3 DESCRIPTION OF TANK STORAGE AND TREATMENT CAPACITY**

15
16 The proposed expansion consists of the addition of greater-than-90-day
17 tank storage and tank treatment of liquid mixed waste until the mixed waste is
18 transferred to the Double-Shell Tank System on the Hanford Facility. The
19 Shielded Analytical Laboratory tank (SAL tank) is located in Room 32
20 (Figure 4). The SAL tank (Figure 5) is constructed of double-walled stainless
21 steel with a design capacity of 1,218 liters and is placed within a
22 cylindrical stainless steel containment structure that provides tertiary
23 containment (Figure 5). Liquid mixed waste, from six interconnected hotcell
24 operations, is conveyed by gravity from the trough in the hot cells to the
25 SAL tank via stainless steel lines (Figure 5).

26
27 The proposed addition of the 325 Collection/Loadout Station Tank is for
28 storage and treatment of mixed waste from various laboratory operations
29 conducted throughout the 325 Building. The proposed tank is to be a
30 double-walled tank with a proposed design capacity of 11,356 liters
31 (Figure 6). The inner shell is stainless steel with the outer shell
32 constructed of carbon steel.

33
34 The types of liquid mixed waste stored and treated in the SAL tank and
35 proposed for the 325 Collection/Loadout Station Tank consist of characteristic
36 waste, toxic constituents, non-specific sources consisting of spent
37 halogenated and non-halogenated solvents, and state-only (extremely hazardous
38 and dangerous) waste. The annual estimated quantity of liquid mixed waste
39 that will be stored and treated in the SAL tank and the proposed
40 325 Collection/Loadout Station Tank is approximately 34,068 kilograms.

41 42 43 **2.4 COMPLIANCE WITH STATE ENVIRONMENTAL POLICY ACT**

44
45 The State Environmental Policy Act of 1971 Environmental Checklist was
46 submitted in 1988. Supplement 1 (Appendix B) provides information pertaining
47 to the SAL tank.
48
49

1 **2.5 COMPLIANCE WITH SITING STANDARDS**

2
3 Demonstration of compliance with the siting criteria as required under
4 WAC 173-303-282(6) and (7) are addressed in the following sections.

5
6
7 **2.5.1 Criteria for Elements of the Natural Environment**

8
9 The following section addresses measures in place at the 325 Hazardous
10 Waste Treatment Units to provide protection of the natural environment. Each
11 element of the criteria identified in the WAC 173-303-282(6) is addressed
12 herein.

13
14 **2.5.1.1 Earth.** This section addresses the potential for the release of mixed
15 waste to the environment because of structural damage to the 325 Building
16 resulting from earth movement in the surrounding area.

17
18 **2.5.1.1.1 Seismic Risk.** The 325 Hazardous Waste Treatment Units are at
19 least 152 meters from any fault that has had displacement in Holocene times.

20
21 No active faults, or evidence of a fault that has had displacement during
22 Holocene times, have been found at the Hanford Site (DOE 1988; WHC 1991). The
23 youngest faults recognized at the Hanford Site occur on Gable Mountain,
24 approximately 32 kilometers northwest of the 325 Hazardous Waste Treatment
25 Units. These faults are of Quaternary age and are considered 'capable' by the
26 Nuclear Regulatory Commission (NRC 1982).

27
28 **2.5.1.1.2 Subsidence.** The 325 Hazardous Waste Treatment Units are
29 located in the 300 Area of the Hanford Facility. This area of the Hanford
30 Facility is not considered an area subject to subsidence (PNL 1992).

31
32 **2.5.1.1.3 Slope or Soil Instability.** The 325 Hazardous Waste Treatment
33 Units are not located in an area of slope or soil instability, or in an area
34 affected by unstable slope or soil conditions (PNL 1992).

35
36 **2.5.1.2 Air.** The 325 Hazardous Waste Treatment Units are not an incineration
37 unit. Discussion of measures taken to reduce air emissions resulting from
38 incineration is not applicable.

39
40 **2.5.1.3 Water.** This section addresses the potential for contaminating water
41 of the state in the event of a release of mixed waste.

42
43 **2.5.1.3.1 Surface Water.** The following addresses considerations for the
44 protection of surface water.

45
46 **2.5.1.3.1.1 Flood, Seiche, and Tsunami Protection.** Three sources of
47 potential flooding of the area were considered: (1) the Columbia River,
48 (2) the Yakima River, and (3) storm-induced run-off in ephemeral streams
49 draining the Hanford Facility. No perennial streams occur in the central part
50 of the Hanford Facility. The 325 Hazardous Waste Treatment Units are not
51 located within the 100- or 500-year floodplain.

1 **2.5.1.3.1.2. Perennial Surface Water Bodies.** The 325 Hazardous Waste
2 Treatment Units are a nonland-based facility as defined in
3 WAC 173-303-282(3)(i). The WAC 173-303-282(6)(c)(i)(B)(I) regulation requires
4 nonland-based facilities be located at least 152 meters from any perennial
5 water body. The 325 Hazardous Waste Treatment Units are over 152 meters from
6 the Columbia River, the closest perennial water body.

7
8 **2.5.1.3.1.3 Surface Water Supply.** The 325 Hazardous Waste Treatment
9 Units are not located within an area designated as a watershed nor located
10 within 152 meters of a surface water intake for domestic water.

11
12 **2.5.1.3.2 Groundwater.** The following addresses consideration for the
13 protection of groundwater. The 325 Building is a nonland-based facility as
14 defined by WAC-173-303-282(3)(i); therefore, compliance with the contingent
15 groundwater protection program is not required.

16
17 **2.5.1.3.2.1 Depth to Groundwater.** The 325 Hazardous Waste Treatment
18 Units are located in the 300 Area of the Hanford Facility. The depth to
19 groundwater at this location is over 12 meters. The depth to groundwater at
20 the lowest point of the 325 Hazardous Waste Treatment Units, including the
21 proposed expansion, is over 7 meters.

22
23 **2.5.1.3.2.2 Sole Source Aquifer.** The 325 Hazardous Waste Treatment
24 Units are not located over an area designated as a 'sole source aquifer' under
25 section 1424(e) of the *Safe Drinking Water Act of 1974*.

26
27 **2.5.1.3.2.3 Groundwater Management Areas and Special Protection Areas.**
28 The 325 Hazardous Waste Treatment Units are not located in a groundwater
29 management area or a special protection area.

30
31 **2.5.1.3.2.4 Groundwater Intakes.** The 325 Hazardous Waste Treatment
32 Units are not located within 152 meters of a groundwater intake for domestic
33 water.

34
35 **2.5.1.4 Plants and Animals.** The following sections address considerations to
36 reduce the potential for mixed waste and/or dangerous waste contaminating
37 plant and animal habitat in the event of a release. The 325 Hazardous Waste
38 Treatment Units are over 152 meters from any of the following.

39
40 **2.5.1.4.1 Wetlands.** The 325 Hazardous Waste Treatment Units are not
41 located near any wetlands.

42
43 **2.5.1.4.2 Designated Critical Habitat.** The 325 Hazardous Waste
44 Treatment Units are not located in an area designated as critical habitat for
45 federally listed threatened or endangered species as defined by the *Endangered*
46 *Species Act of 1973*.

47
48 **2.5.1.4.3 State Designated Habitat.** The 325 Hazardous Waste Treatment
49 Units are not located in an area designated by the Washington State Department
50 of Wildlife as habitat essential to the maintenance or recovery of any state
51 listed threatened or endangered species.

1 **2.5.1.4.4 Natural Area Preserves.** The 325 Hazardous Waste Treatment
2 Units are not located in any natural area acquired or voluntarily registered
3 or dedicated under Chapter 79.70 Revised Code of Washington.

4
5 **2.5.1.4.5 Wildlife Refuge, Preserve, or Bald Eagle Protection Area.** The
6 325 Hazardous Waste Treatment Units are not located in a state or federally
7 designated wildlife refuge, preserve, or bald eagle protection area.

8
9 **2.5.1.5 Precipitation.** The 325 Hazardous Waste Treatment Units is a nonland-
10 based facility; therefore, compliance with the precipitation requirements is
11 not required.

12 13 14 **2.5.2 Criteria for Elements of the Built Environment**

15
16 The following sections address the locational factors affecting
17 protection of the built environment. Each element of the criteria for
18 nonland-based facilities or units identified in WAC 173-303-282(7) is
19 addressed.

20
21 **2.5.2.1 Adjacent Land Use.** This section addresses the setback criteria for
22 adjacent land use.

23
24 **Nonland-Based Facilities.** The 325 Hazardous Waste Treatment Units are
25 located over 152 meters from the closest Hanford Facility property line.

26
27 **2.5.2.2 Special Land Uses.** This section addresses setback criteria for
28 special land uses.

29
30 **2.5.2.2.1 Wild and Scenic Rivers.** The southern boundary of the Hanford
31 Reach of the Columbia River, a proposed wild and Scenic River, is at mile
32 marker 346.5, north of the 300 Area of the Hanford Facility. This proposed
33 boundary for the Wild and Scenic River was established specifically to exclude
34 any part of the 300 Area from requirements in the *Wild and Scenic Rivers Act*
35 *of 1968*.

36
37 Therefore the 325 Hazardous Waste Treatment Units are not within the
38 viewshed of users of the Columbia River.

39
40 **2.5.2.2.2 Parks, Recreation Areas, National Monuments.** The
41 325 Hazardous Waste Treatment Units are situated over 152 meters from the
42 nearest state or federally designated park, recreation area, or national
43 monument.

44
45 **2.5.2.2.3 Wilderness Areas.** The 325 Hazardous Waste Treatment Units are
46 located over 152 meters from any Wilderness Areas as defined by the *Wilderness*
47 *Act of 1964*.

48
49 **2.5.2.2.4 Farmland.** The 325 Hazardous Waste Treatment Units are over
50 152 meters from any commercial or private prime farmland.

1 **2.5.2.3 Residences and Public Gathering Places.** This section discusses
2 factors affecting residences and public gathering places. The 325 Hazardous
3 Waste Treatment Units are located over 152 meters from residences and public
4 gathering places.

5
6 **2.5.2.3.1 Incineration.** Incineration is not a process used at the
7 325 Hazardous Waste Treatment Units. Therefore, this criterion is not
8 applicable.

9
10 **2.5.2.3.2 Land Use Compatibility.** The Hanford Facility conforms with
11 local land use zoning designation requirements.

12
13 **2.5.2.3.3 Archeological Sites and Historic Sites.** No places or objects
14 listed on, or proposed for, national, state, or local preservation registers
15 are known to be on or next to the 325 Hazardous Waste Treatment Units. There
16 are no known archaeological, historical, or Native American religious sites on
17 or next to the 325 Hazardous Waste Treatment Units.

20 21 **3.0 TEN-YEAR NONCOMPLIANCE HISTORY**

22
23
24 Appendix C summarizes Notice of Compliance Violations and the associated
25 responses. This summary and the correspondence associated with notices of
26 compliance violations can be obtained by contacting the following:

27
28 Public Access Room H6-08
29 Westinghouse Hanford Company
30 P.O. Box 1970
31 Richland, Washington 99352
32 (509) 372-3411.

34 35 36 **4.0 JUSTIFICATION OF NEED**

37
38
39 In May 1989, the U.S. Department of Energy along with Ecology and the EPA
40 formally entered into an agreement (Tri-Party Agreement) (Ecology et al. 1994)
41 for the purpose of the Hanford Facility gaining compliance with federal,
42 state, and local laws concerning the management of waste. The operation of
43 the 325 Hazardous Waste Treatment Units will support Tri-Party Agreement
44 milestones by providing a means to treat and store mixed waste and/or
45 dangerous waste and prepare the waste for transfer within the Hanford
46 Facility. Included within the Tri-Party Agreement are milestones for
47 environmental restoration and waste stabilization on the Hanford Facility.

48
49 The ability to store and treat mixed waste for greater-than-90 days in
50 the SAL tank and the proposed 325 Collection/Loadout Station Tank will
51 increase both safety and efficiency of waste management activities at the

1 325 Hazardous Waste Treatment Units. In addition, the storage and treatment
2 ability will provide future flexibility in using other mechanisms to transfer
3 liquid mixed waste to the Double-Shell Tank System. This potentially could
4 minimize or eliminated the use of flushwaters required by the current system,
5 thus providing an opportunity for waste minimization. Because of delays in
6 transferring liquid mixed waste to the Double-Shell Tank System by railcar,
7 caused by waste minimization transfer considerations, and the necessity of
8 minimizing the number of railcar waste transfers, it is necessary to expand
9 the 325 Hazardous Waste Treatment Units liquid mixed waste management
10 activities to include tank storage and treatment.

11 12 13 14 **5.0 IMPACT ON OVERALL CAPACITY AT THE HANFORD FACILITY AND** 15 **THE STATE OF WASHINGTON** 16

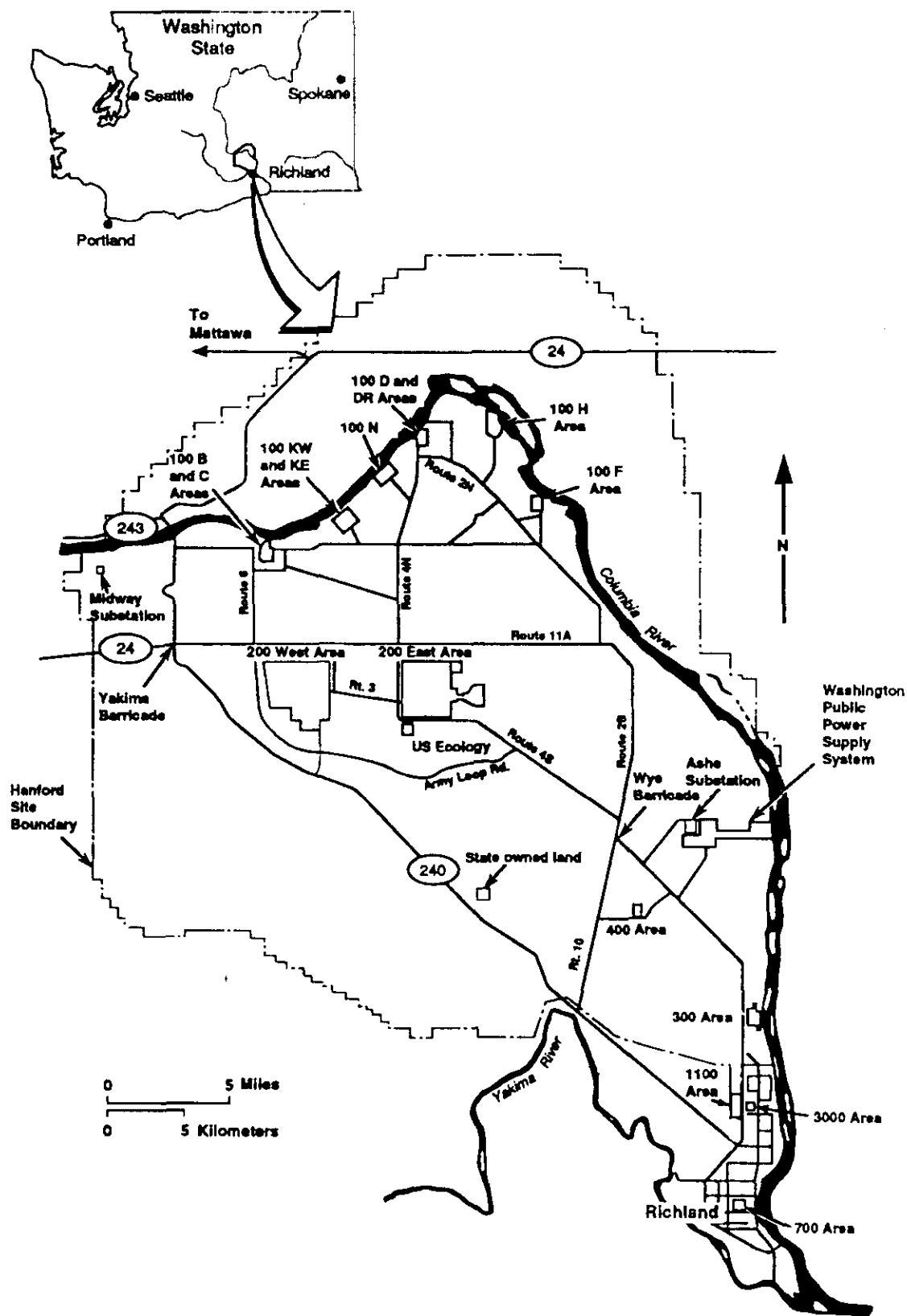
17
18 The current capacity for the treating, storing, and/or disposing of
19 liquid mixed waste is limited within Washington State and the Hanford
20 Facility. The expansion at the 325 Hazardous Waste Treatment Units will allow
21 for treatment and storage of mixed waste and/or dangerous waste and will
22 comply with WAC 173-303 regulations on mixed waste. This expansion for
23 treatment and storage capacity at the 325 Hazardous Waste Treatment Units
24 supports the Hanford Site mission of remediation and restoration.
25
26
27

6.0 REFERENCES

- DOE, 1988, *Consultation Draft, Site Characterization Plan*, Reference Repository Location, Hanford Site, Washington, DOE/RL-0164, Vols. 1-9, U.S. Department of Energy, Washington, D.C.
- DOE-RL, 1988, *Hanford Facility Dangerous Waste Part A Permit Application*, DOE/RL-88-21, Vols. 1-3, U.S. Department of Energy, Richland Operations Office, Richland, Washington.
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- ICBO, 1991, "Earthquake Regulations," *Uniform Building Code, UBC Section 2312*, International Conference of Building Officials, Whittier, California.
- NRC, 1982, *Safety Evaluation Report (Related to the Operation of WPPSS Nuclear Project) No. 2*, NUREG-0892 Supplement No. 1, U.S. Nuclear Regulatory Commission, Washington, D.C.
- PNL, 1992, *Safety Analysis Report for 325 Building*, PNL-7748, Pacific Northwest Laboratory, Richland, Washington.
- PNL, 1995, *Hanford Site National Environmental Policy Act (NEPA) Characterization*, PNL-6415, Revision 7, Pacific Northwest Laboratory, Richland, Washington.

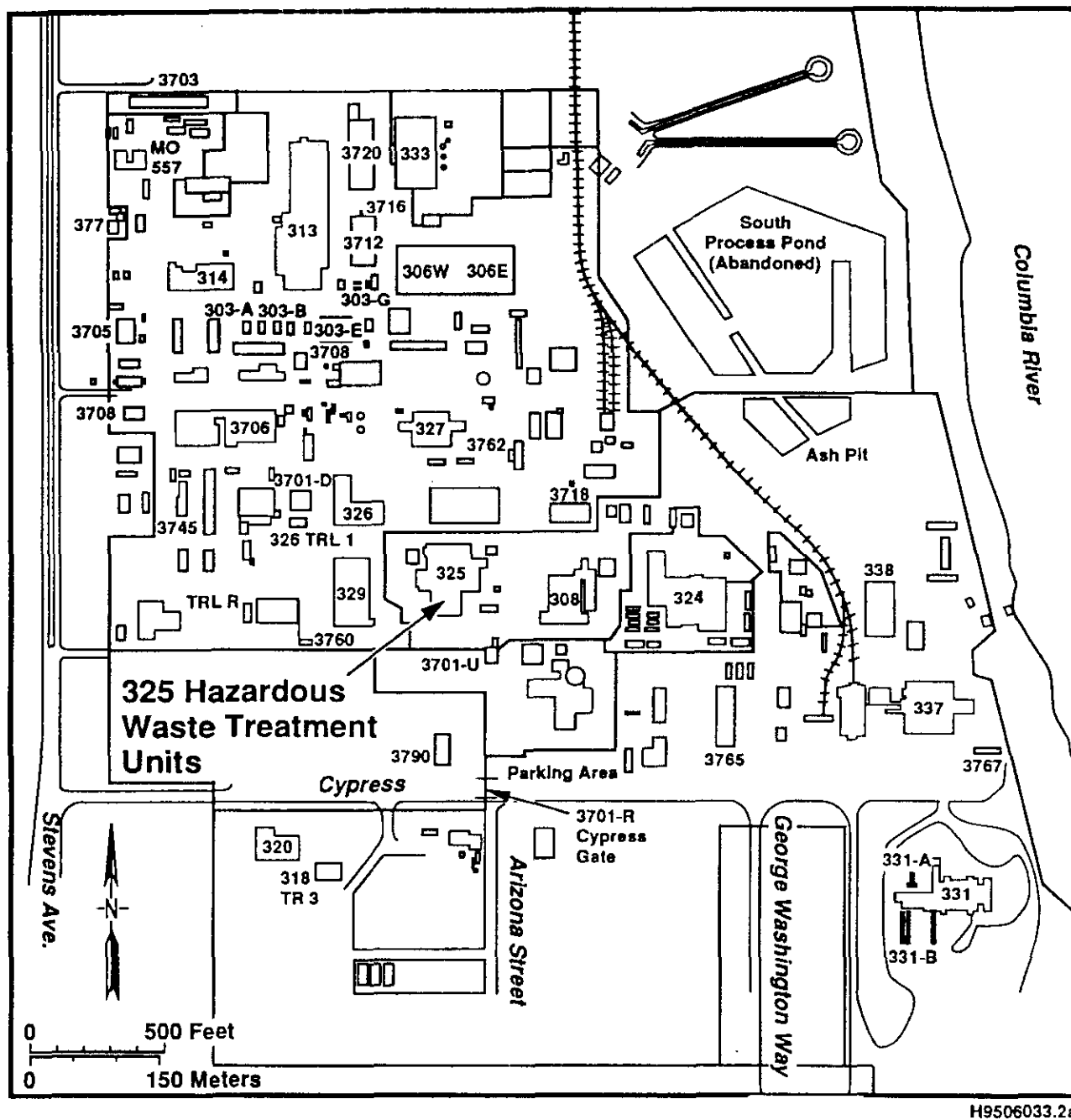
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Figure 1. Hanford Facility.

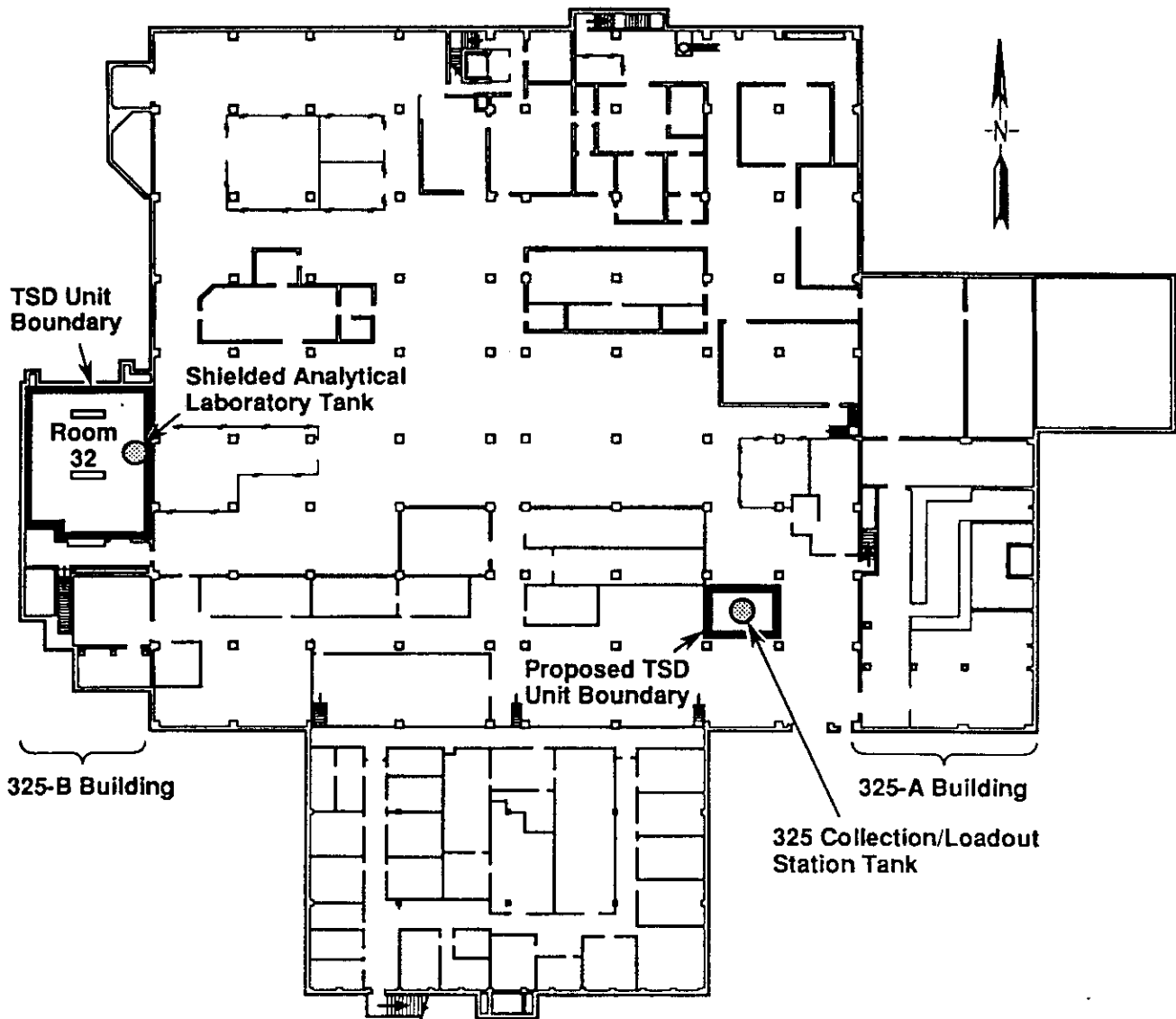


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Figure 2. Location of the 325 Hazardous Waste Treatment Units in the 300 Area.



Figure 3. Location of the Hazardous Waste Treatment Unit and Shielded Analytical Laboratory (main floor).



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Figure 4. Location of Shielded Analytical Laboratory Tank in Room 32 and Proposed Location of 325 Collection/Loadout Station Tank (basement) of the 325 Building.

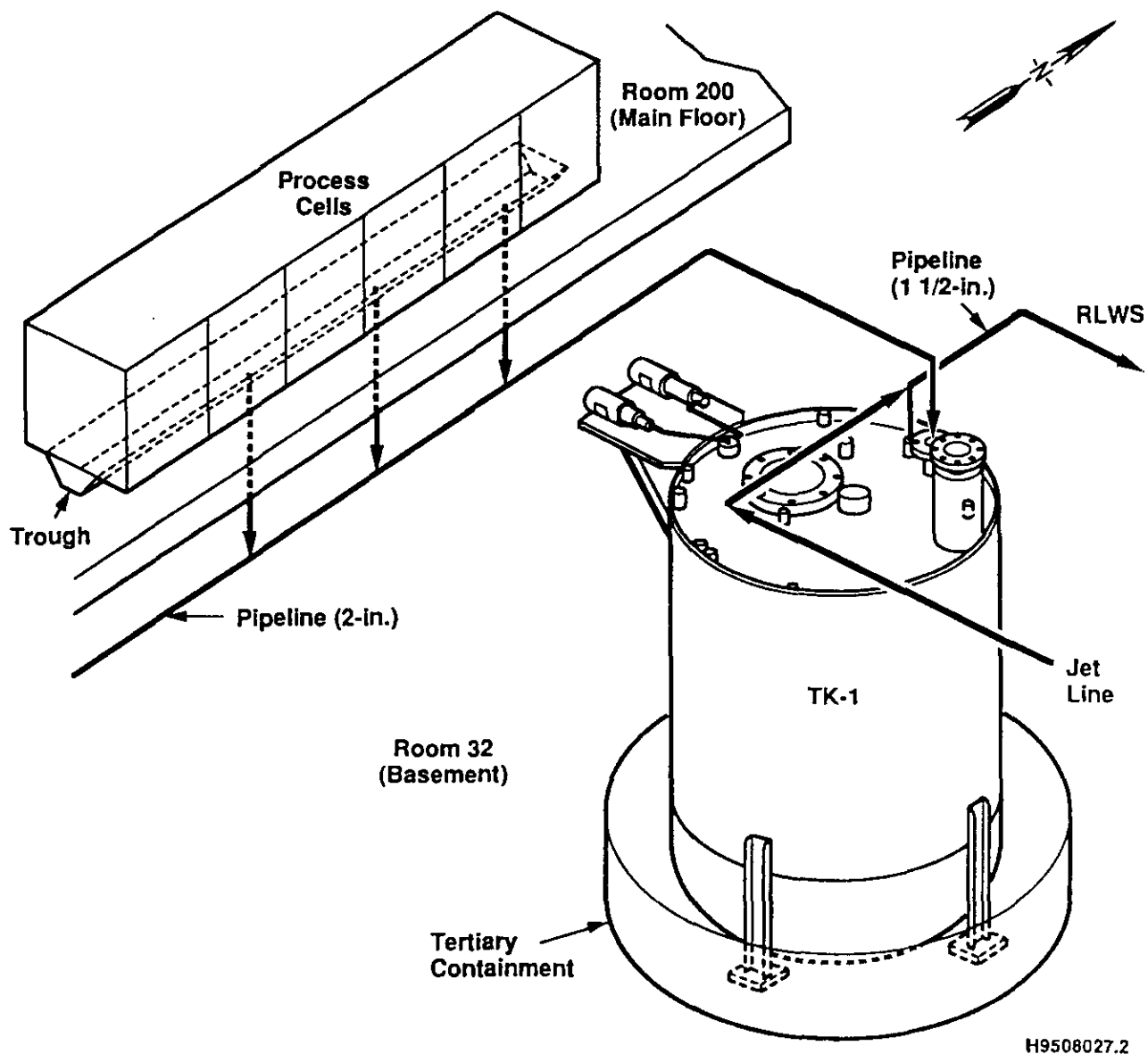


Figure 5. Shielded Analytical Laboratory Tank and Ancillary Piping.

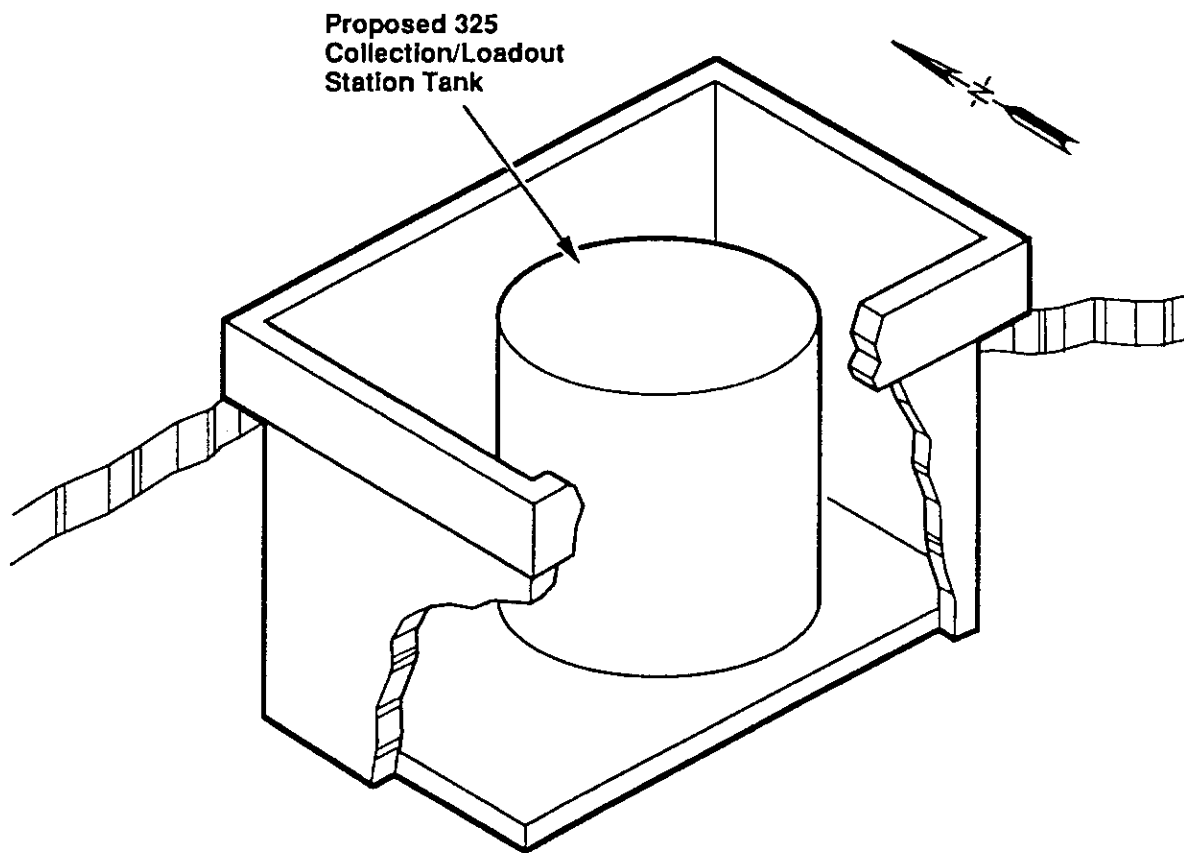


Figure 6. Proposed 325 Collection/Loadout Station Tank.

APPENDICES

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- A LOCATION MAPS
- B STATE ENVIRONMENTAL POLICY ACT ENVIRONMENTAL CHECKLIST
- C SUMMARY OF NOTICES OF COMPLIANCE VIOLATIONS AND THE
U.S. DEPARTMENT OF ENERGY, RICHLAND OPERATIONS OFFICE RESPONSES

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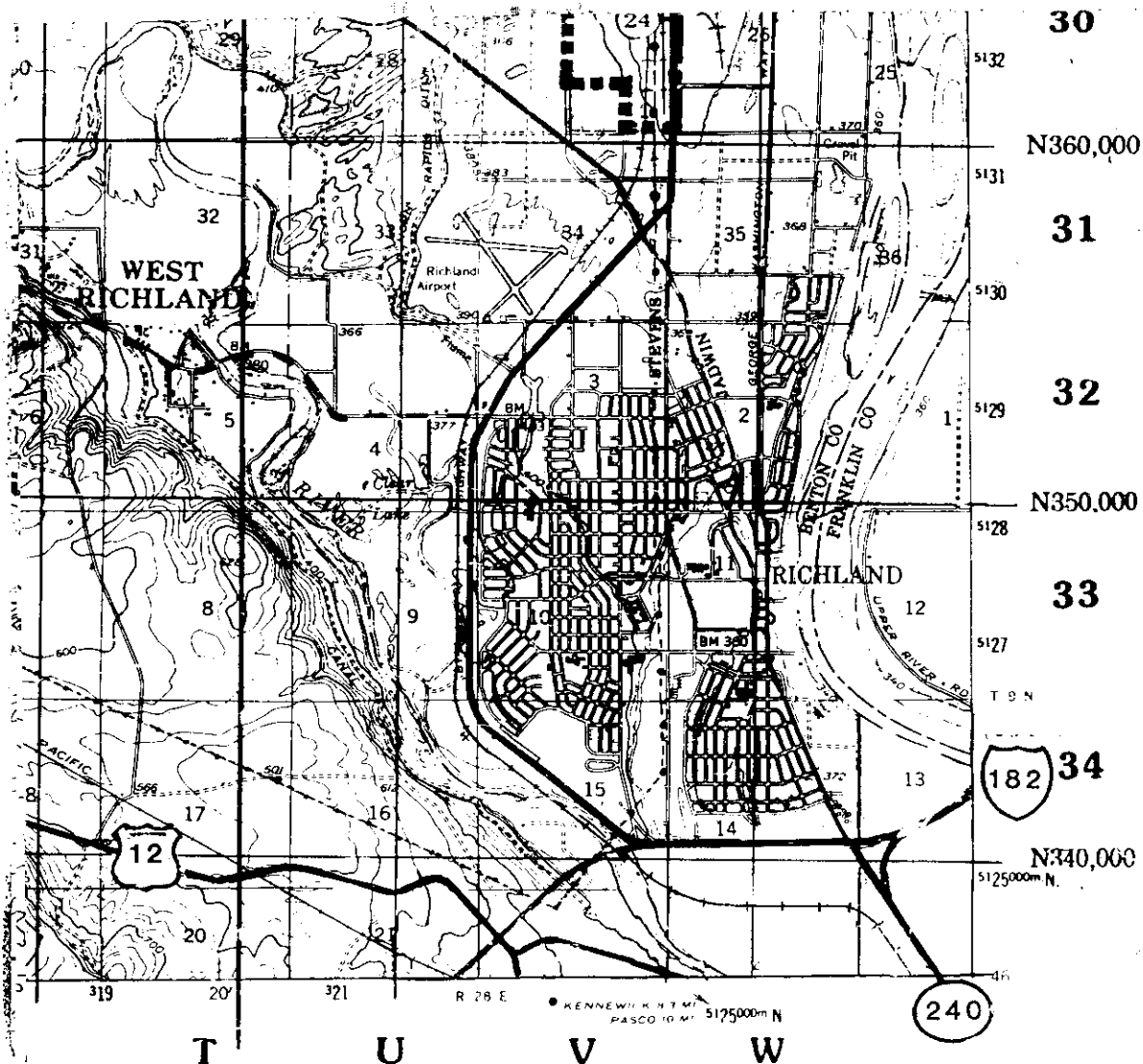
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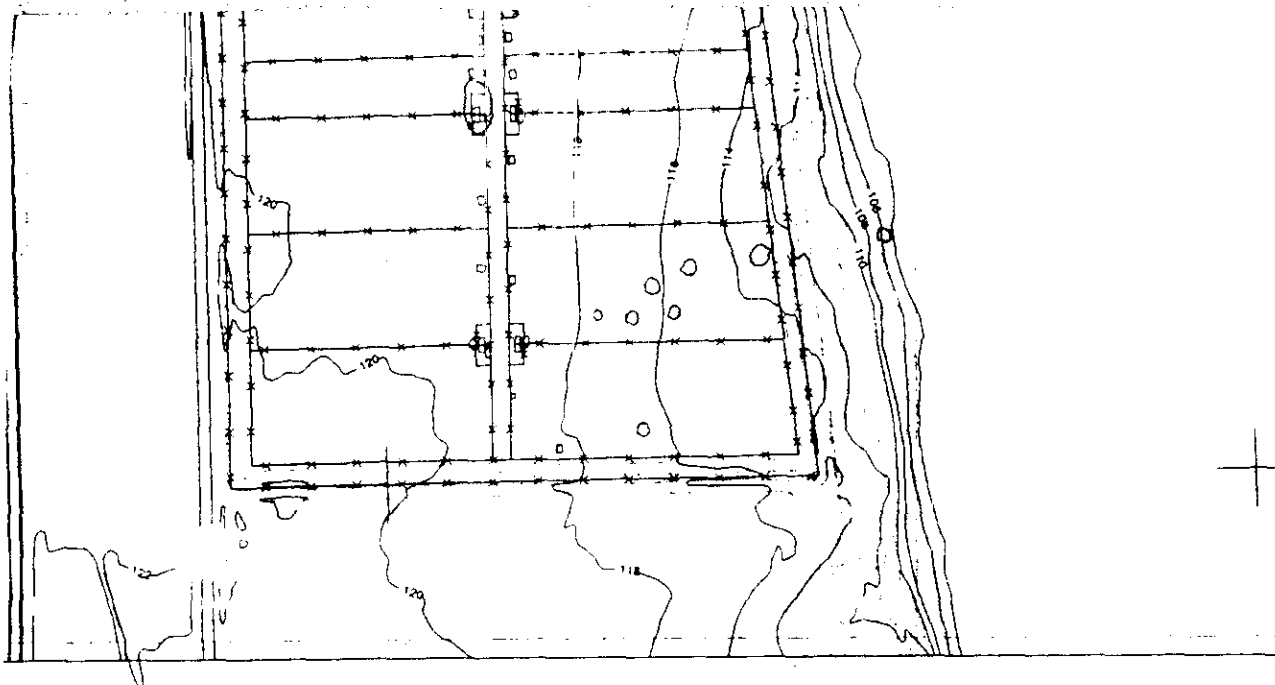
APPENDIX A
LOCATION MAPS

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DRAWING APPROVALS		DATE		U. S. Department of Energy Richland Operations Office			
APPD FOR QUALITY ASSURANCE				 Westinghouse Hanford Company			
APPD		3/87					
APPD		13/87		<h1>GENERAL OVERVIEW OF HANFORD SITE</h1>			
APPD							
RESPONSIBLE ENGINEER		3/87					
R.L. MARTELL							
DRAFTING APPD				SCALE AS SHOWN 600 GEN INDEX NO. 0100			
CHECKED		3/87		DRAWN K.D. JUNT			
CLASSIFICATION		BY		DRAWING NO.		SHEET NO.	
NONE		NOT REQ'D		H-6-958		1	



N 51000

SEP 08 1995

THIS MAP IS TO BE USED FOR REFERENCE PURPOSES ONLY.
DO NOT USE THIS MAP FOR CONSTRUCTION PURPOSES.

DWG NO H-13-000197 SH 1 OF 1 REV 0

A

DRAWN RAFAEL TORRES		DATE 8-29-95		U.S. DEPARTMENT OF ENERGY Richland Operations Office Westinghouse Hanford Company 325 HAZARDOUS WASTE TREATMENT UNITS TOPOGRAPHIC MAP			
CHECKED <i>[Signature]</i>		8-30-95					
DFTG APVD <i>[Signature]</i>		8-30-95					
COG ENGR <i>[Signature]</i>		8/30/95		APP 9/5/95 AA			
APVD <i>[Signature]</i>		8/30/95					
APVD <i>[Signature]</i>		8/30/95					
COG ENGR <i>[Signature]</i>		7-6-95					
APVD		SIZE F	BLDG NO 325	INDEX NO 0103	DWG NO H-13-000197	REV 0	
APVD		SCALE SHOWN		EDT 612843		SHEET 1 OF 1	

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APPENDIX B

STATE ENVIRONMENTAL POLICY ACT ENVIRONMENTAL CHECKLIST

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STATE ENVIRONMENTAL POLICY ACT
ENVIRONMENTAL CHECKLIST FORMS

FOR

HANFORD FACILITY,
325 HAZARDOUS WASTE TREATMENT UNITS

SUPPLEMENT 1

SEPTEMBER 1995

WASHINGTON ADMINISTRATIVE CODE
ENVIRONMENTAL CHECKLIST FORMS
[WAC 197-11-960]

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A. BACKGROUND

1. Name of project, if applicable:

325 Hazardous Waste Treatment Units. This checklist accompanies a Notice of Intent (NOI) to expand tank storage and treatment capacity of the Shielded Analytical Laboratory and of the proposed 325 Collection/Loadout Station Tank, located in the 325 Building in the 300 Area.

2. Name of applicants:

U.S. Department of Energy, Richland Operations Office (DOE-RL).

3. Address and phone number of applicants and contact persons:

U.S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352.

Contact Persons:

J. E. Rasmussen, Director
Office of Environmental Assurance,
Permits, and Policy Division
(509) 376-5541.

4. Date checklist prepared:

September 1995.

5. Agency requesting the checklist:

Washington State Department of Ecology
Kennewick Office
1315 West 4th Avenue
Kennewick, Washington 99336

6. Proposed timing or schedule: (including phasing, if applicable):

This SEPA Environmental Checklist is being submitted concurrently with the Hanford Facility, 325 Hazardous Waste Treatment Units NOI. The NOI is submitted in accordance with the Washington State Department of Ecology (Ecology) *Dangerous Waste Regulations*, Washington Administrative Code (WAC) 173-303-281, "Notice of Intent", which requires that dangerous waste facility owners and/or operators submit a NOI before submittal of a Part A permit application, Form 3, for new or expanded dangerous waste treatment, storage, and/or disposal (TSD) units. After submittal of the NOI, there will be an opportunity for public notification and review for 150 days. Submittal of the Hanford Facility Dangerous Waste Part A

1 Permit Application, Form 3, for the 325 Hazardous Waste Treatment Units
2 will occur after the public comment period.

- 3
4 7. Do you have any plans for future additions, expansions, or further
5 activity related to or connected with this proposal? If yes, explain.

6
7 No.

- 8
9 8. List any environmental information you know about that has been prepared,
10 or will be prepared, directly related to this project.

11
12 This SEPA Environmental Checklist is being submitted to Ecology
13 concurrently with the NOI for the Hanford Facility, 325 Hazardous Waste
14 Treatment Units. A Part A permit application, Form 3, will be submitted
15 150 days after submission of the 325 Hazardous Waste Treatment Units NOI
16 in accordance with WAC 173-303-281.

17
18 General information concerning the Hanford Facility environment can be
19 found in the *Hanford Site National Environmental Policy Act (NEPA)*
20 *Characterization*, PNL-6415, Revision 7, September 1995. This document is
21 updated periodically by Pacific Northwest Laboratory (PNL), and provides
22 current information concerning climate and meteorology; ecology; history
23 and archeology; socioeconomic; land use and noise levels; and geology and
24 hydrology. This baseline data for the Hanford Site and its past
25 activities are useful for evaluating proposed activities and their
26 potential environmental impacts.

- 27
28 9. Do you know whether applications are pending for government approvals of
29 other proposals directly affecting property covered by your proposal?

30
31 No applications to government agencies are known to be pending.

- 32
33 10. List any government approvals or permits that will be needed for your
34 project, if known.

35
36 Ecology is the lead regulatory agency authorized to approve the Part A
37 permit application, Form 3, pursuant to the requirements of WAC 173-303
38 and 40 Code of Federal Regulations (CFR) Part 265. The NOI provides
39 public notice of the intention to conduct the waste treatment and storage
40 activities at the 325 Hazardous Waste Treatment Units.

- 41
42 11. Give a brief, complete description of the project, including the uses and
43 the size of the project and site. There are several questions later in
44 this checklist that ask you to describe certain aspects of your project.
45 You do not need to repeat those answers on this page.

46
47 The Shielded Analytical Laboratory is an analytical chemistry laboratory,
48 located in rooms 32 (basement), 200, 201, 201A, 202, and 203 on the west
49 side of the 325 Building, used to prepare and analyze samples of mixed
50 waste materials. The Shielded Analytical Laboratory also is used for the
51 treatment and storage of mixed waste generated from analytical chemistry
52 and/or research and development operations.

1 The SAL tank is located in Room 32 in the basement of the 325 Building.
2 The SAL tank is a double-walled tank constructed of stainless steel with
3 a capacity of 1,128 liters. The tank is placed within a cylindrical
4 stainless steel containment structure that provides tertiary containment.
5 The liquid mixed waste is conveyed by gravity from the trough in the hot
6 cells to the SAL tank via stainless steel drain lines. The liquid mixed
7 waste stored in the SAL tank eventually is transferred to the Double-
8 Shell Tank System on the Hanford Site for storage and treatment. The
9 SAL tank, with a design capacity of 1,218 liters, will have an annual
10 throughput of approximately 22,712 liters.
11

12 The Shielded Analytical Laboratory hot cells consist of six
13 interconnected cells situated side by side in the center of the Shielded
14 Analytical Laboratory. The hot cells are used to conduct sample
15 preparation and sample analysis. As part of the overall waste management
16 program, the mixed waste generated during the analytical chemistry
17 operations is treated within the hot cells to reduce the overall hazard
18 of the waste before disposal. An interconnected stainless steel trough
19 runs along the front of all of the hot cells. The trough is equipped
20 with a stainless steel grating at the cell floor level. The trough is
21 the means by which waste is drained to the SAL tank through stainless
22 steel piping. All hot cells are used for analytical chemistry work.
23

24 The proposed addition of the 325 Collection/Loadout Station Tank is for
25 storage and treatment of mixed waste from various laboratory operations
26 conducted throughout the 325 Building. The proposed tank is to be a
27 double-walled tank with a proposed design capacity of 11,356 liters. The
28 inner shell is stainless steel with the outer shell constructed of carbon
29 steel.
30

- 31 12. Location of the project. Give sufficient information for a person to
32 understand the precise location of your project, including a street
33 address, if any, and section, township, and range, if known. If the
34 project occurs over a range of area, provide the range or boundaries of
35 the site(s). Provide a legal description, site plan, vicinity map, and
36 topographic map, if reasonably available. While you should submit any
37 plans required by the agency, you are not required to duplicate maps or
38 detailed plans submitted with any permit applications related to this
39 checklist.
40

41 The 325 Hazardous Waste Treatment Units are located in T10N, R25E,
42 Section 11, in the southern portion of the 300 Area of the Hanford
43 Facility. Site plans and maps are included with the accompanying NOI.
44
45
46

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EVALUATIONS FOR
AGENCY USE ONLY

B. ENVIRONMENTAL ELEMENTS

1. Earth

- a. General description of the site- Flat, rolling, hilly, steep slopes, mountainous, other.

The site is essentially flat.

- b. What is the steepest slope on the site (approximate percent slope)?

Approximately 2 percent.

- c. What general types of soils are found on the site? (for example, clay, sandy gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.

Soil types consist mainly of eolian and fluvial sands and gravel. More detailed information concerning specific soil classifications can be found in the *Hanford Site National Environmental Policy Act (NEPA) Characterization*, PNL-6415, Revision 7, September 1995. Farming is not permitted on the Hanford Facility.

- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

No.

- e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.

No filling or grading is required.

- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

No.

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EVALUATIONS FOR
AGENCY USE ONLY

- 1 g. About what percent of the site will be
2 covered with impervious surfaces after
3 project construction (for example, asphalt
4 or buildings)?

5
6 Not applicable. No construction would
7 occur.

- 8
9 h. Proposed measures to reduce or control
10 erosion, or other impacts to the earth, if
11 any:

12
13 Not applicable. Earth would not be
14 disturbed.

15
16 2. Air

- 17
18 a. What types of emissions to the air would
19 result from the proposal (i.e., dust,
20 automobile, odors, industrial wood smoke)
21 during construction and when the project is
22 completed? If any, generally describe and
23 give approximate quantities, if known.

24
25 Minor amounts of exhaust would be generated
26 by vehicles used by personnel to gain access
27 to the 325 Hazardous Waste Treatment Units.

28
29 An airborne release could occur as a result
30 of upset conditions internally or
31 externally. Such a release would not exceed
32 immediately dangerous to life and health
33 concentrations outside the immediate area of
34 the spill/release because of the small
35 quantity of material that is available for
36 release.

- 37
38 b. Are there any off-site sources of emissions
39 or odors that may affect your project? If
40 so, generally describe.

41
42 No.

- 43
44 c. Measures to reduce or control emissions or
45 other impacts to the air, if any?

46
47 Good engineering practices would be
48 followed, and actions would comply with

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EVALUATIONS FOR
AGENCY USE ONLY

onsite procedures designed to protect the environment and worker safety and health. Administrative control practices and high-efficiency particulate air filters would limit air emissions as well as protect worker health.

3. Water

a. Surface

- 1) Is there any surface water body in or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

The Columbia River is in the vicinity of the 325 Hazardous Waste Treatment Units. However, the 325 Hazardous Waste Treatment Units are a nonland-based facility as defined in WAC 173-303-282(3)(i). The WAC 173-303-282(6)(c)(i)(B)(I) requires nonland-based facilities be located at least 152 meters from any perennial water body. The WAC 173-303-282(6)(d)(i) requires nonland-based facilities be located at least 152 meters from any wetlands, designated critical habitats, habitats designated by the Washington State Department of Wildlife as habitat essential to the maintenance or recovery of any state listed threatened or endangered wildlife species, natural areas that are acquired or voluntarily registered or dedicated by the owner, or state or federally designated wildlife refuges, preserves, or bald eagle protection areas. The 325 Hazardous Waste Treatment Units are over 152 meters from any of these areas.

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- 1 2) Will the project require any work over,
2 in, or adjacent to (within 200 feet)
3 the described waters? If yes, please
4 describe and attach available plans.

5
6 No.

- 7
8 3) Estimate the amount of fill and dredge
9 material that would be placed in or
10 removed from surface water or wetlands
11 and indicate the area of the site that
12 would be affected. Indicate the source
13 of fill material.

14
15 None.

- 16
17 4) Will the proposal require surface water
18 withdrawals or diversions? Give
19 general description, purpose, and
20 approximate quantities if known.

21
22 No.

- 23
24 5) Does the proposal lie within a 100-year
25 floodplain? If so, note location on
26 the site plan.

27
28 No.

- 29
30 6) Does the proposal involve any
31 discharges of waste materials to
32 surface waters? If so, describe the
33 type of waste and anticipated volume of
34 discharge.

35
36 No.

37
38 b. Ground

- 39
40 1) Will ground water be withdrawn, or will
41 water be discharged to ground water?
42 Give general description, purpose, and
43 approximate quantities if known.

44
45 No.

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EVALUATIONS FOR
AGENCY USE ONLY

- 1 2) Describe waste materials that will be
2 discharged into the ground from septic
3 tanks or other sources, if any (for
4 example: Domestic sewage; industrial,
5 containing the following chemicals;
6 agricultural; etc.). Describe the
7 general size of the system, the number
8 of such systems, the number of houses
9 to be served (if applicable), or the
10 number of animals or humans the
11 system(s) are expected to serve.

12 None.

13
14
15 c. Water Run-off (including storm water)

- 16
17 1) Describe the source of run-off
18 (including storm water) and methods of
19 collection and disposal, if any
20 (include quantities, if known). Where
21 will this water flow? Will this water
22 flow into other wastes? If so,
23 describe.

24
25 The Hanford Facility receives only
26 15.2 to 17.8 centimeters of annual
27 precipitation. Precipitation runs off
28 the existing buildings and seeps into
29 the soil on and near the buildings.
30 This precipitation does not reach the
31 groundwater or surface waters.
32 Precipitation would not come in contact
33 with any of the liquid mixed waste
34 treated and/or stored by normal
35 activities.

- 36
37 2) Could waste materials enter ground or
38 surface waters? If so, generally
39 describe.

40
41 Yes, in the remote possibility that
42 liquid waste in the SAL tank and/or the
43 proposed 325 Collection/Loadout Station
44 Tank escaped from containment barriers.
45 These tank areas would be monitored and
46 work procedures would be in place in
47 the unlikely event of a release.
48

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AGENCY USE ONLY

- 1 d. Proposed measures to reduce or control
2 surface, ground, and run-off water impacts,
3 if any:

4
5 In the event a tank leak is detected, the
6 tank involved would be isolated and tank
7 contents removed.

8
9 4. Plants

- 10
11 a. Check the types of vegetation found onsite.

12
13 ☐ deciduous tree
14 ☐ evergreen tree
15 ☐ shrubs
16 ☒ grass
17 ☐ pasture
18 ☐ crop or grain
19 ☐ wet soil plants
20 ☐ water plants
21 ☐ other types of vegetation

22
23 The most common vegetation community in the
24 300 Area is the sagebrush/cheatgrass or
25 Sandberg's bluegrass. Native vegetation in
26 the immediate vicinity of the 325 Hazardous
27 Waste Treatment Units has been eradicated.
28 Vegetation consists primarily of cultivated
29 ornamentals.

- 30
31 b. What kind and amount of vegetation will be
32 removed or altered?

33
34 No native vegetation alteration would occur.

- 35
36 c. List threatened or endangered species known
37 to be on or near the site.

38
39 None. Additional information on the Hanford
40 Facility environment can be found in the
41 environmental document referred to in the
42 answer to Checklist Question A.8.

- 43
44 d. Proposed landscaping, use of native plants,
45 or other measures to preserve or enhance
46 vegetation on the site, if any:

47
48 Not applicable.

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EVALUATIONS FOR
AGENCY USE ONLY

5. Animals

- a. Underline any birds and animals which have been observed on or near the site or are known to be on or near the site:

birds: hawk, heron, eagle, songbirds,
other: _____

mammals: deer, bear, elk, beaver,
other:Small mammals

fish: bass, salmon, trout, herring,
shellfish, other: _____

Raptors (burrowing owls, ferruginous, redtail, and Swainson's hawks) are rarely seen in the 300 Area. Small passerines (sparrows, finches) are present in the general vicinity of the 325 Hazardous Waste Treatment Units. Mule deer, rabbits, and coyotes occasionally are seen in the general area.

- b. List any threatened or endangered species known to be on or near the site.

Two federal and state listed threatened or endangered species have been identified on the 1,450-square kilometer Hanford Site along the Columbia River; the bald eagle and peregrine falcon. In addition, the state listed white pelican, sandhill crane, and ferruginous hawk also occur on or migrate through the Hanford Site. Of these five species, none is likely to use the shrub-steppe habitat of the 300 Area.

- c. Is the site part of a migration route? If so, explain.

The Hanford Facility is part of the broad Pacific flyway.

- d. Proposed measures to preserve or enhance wildlife, if any:

None.

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EVALUATIONS FOR
AGENCY USE ONLY

6. Energy and Natural Resources

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Electricity is used to operate monitoring devices and pumps for the SAL tank and the proposed 325 Collection/Loadout Station Tank.

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

No.

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

None.

7. Environmental Health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

Possible environmental health hazards to workers could arise from activities at the 325 Hazardous Waste Treatment Units. The hazard could come from exposure to radioactive, dangerous, and/or mixed waste. Stringent administrative controls and engineered barriers are employed to minimize the probability of even a minor incident and/or accident. A chemical spill, release, fire, or explosion could occur only as a result of a simultaneous breakdown in multiple barriers or a catastrophic natural forces event.

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EVALUATIONS FOR
AGENCY USE ONLY

- 1) Describe special emergency services that might be required.

Hanford Facility security, fire response, and ambulance services are on call at all times in the event of an onsite emergency. Hanford Facility emergency services personnel are specially trained to manage a variety of circumstances involving chemical and/or mixed waste constituents and situations.

- 2) Proposed measures to reduce or control environmental health hazards, if any:

All personnel are trained to follow proper procedures during the treatment and storage operations to minimize potential exposure. The 325 Hazardous Waste Treatment Units have systems for ventilation, radiation monitoring, fire protection, and alarm capability. The heating, ventilation, and air conditioning system maintains a negative air pressure on the complex.

Chemical and radiological safety hazards would be mitigated by preventing direct contact with the residual chemical constituents; high-efficiency particulate air filtration of all offgas streams; and protective clothing, appropriate training, and respiratory protection used by onsite personnel as necessary.

b. Noise

- 1) What type of noise exists in the area which may affect your project (for example: traffic, equipment, operation, other)?

None.

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EVALUATIONS FOR
AGENCY USE ONLY

- 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

None.

- 3) Proposed measures to reduce or control noise impacts, if any:

None.

8. Land and Shoreline Use

- a. What is the current use of the site and adjacent properties?

The Hanford Facility is a single RCRA facility identified by the U.S. Environmental Protection Agency (EPA)/State Identification Number WA7890008967 that consists of over 60 TSD units conducting dangerous waste management activities. These TSD units are included in the *Hanford Facility Dangerous Waste Part A Permit Application*. The Hanford Facility consists of all contiguous land, and structures, other appurtenances, and improvements on the land, used for recycling, reusing, reclaiming, transferring, storing, treating, or disposing of dangerous waste, which, for the purposes of the RCRA, are owned by the U.S. Government and operated by the DOE-RL, excluding land owned by Washington State.

- b. Has the site been used for agriculture? If so, describe.

No portion of the Hanford Facility has been used for agricultural purposes since 1943.

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR
AGENCY USE ONLY

1 c. Describe any structures on the site.

2
3 The 325 Building, located in the 300 Area,
4 is a steel and reinforced concrete structure
5 that is 83 meters wide, 87 meters long, and
6 12 meters high. Numerous buildings surround
7 the 325 Building as a result of the
8 developed 300 Area.
9

10 d. Will any structures be demolished? If so,
11 what?

12
13 No.
14

15 e. What is the current zoning
16 classification of the site?

17
18 The Hanford Site is zoned by Benton County
19 as an Unclassified Use (U) district.
20

21 f. What is the current comprehensive plan
22 designation of the site?

23
24 The 1985 Benton County Comprehensive Land
25 Use Plan designates the Hanford Site as the
26 "Hanford Reservation". Under this
27 designation, land on the Hanford Site may be
28 used for "activities nuclear in nature."
29 Nonnuclear activities are authorized if and
30 when DOE approval for such activities is
31 obtained".
32

33 g. If applicable, what is the current
34 shoreline master program designation of
35 the site?

36
37 Not applicable.
38

39 h. Has any part of the site been classified as
40 an "environmentally sensitive" area? If so,
41 specify.

42
43 No.
44

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EVALUATIONS FOR
AGENCY USE ONLY

- 1 i. Approximately how many people would reside
2 or work in the completed project?

3
4 Approximately 15 people work at the
5 325 HWTUs; others assist as required. No
6 additional staff will be required as a
7 result of adding the additional tanks.
8

- 9 j. Approximately how many people would the
10 completed project displace?

11
12 None.

- 13
14 k. Proposed measures to avoid or reduce
15 displacement impacts, if any:

16
17 None.

- 18
19 l. Proposed measures to ensure the proposal is
20 compatible with existing and projected land
21 uses and plans, if any:

22
23 Not applicable. (Refer to Checklist
24 Question B.8.f)
25

26 9. Housing

- 27
28 a. Approximately how many units would be
29 provided, if any? Indicate whether high,
30 middle, or low-income housing.

31
32 None.

- 33
34 b. Approximately how many units, if any, would
35 be eliminated? Indicate whether high,
36 middle, or low-income housing.

37
38 None.

- 39
40 c. Proposed measures to reduce or control
41 housing impacts, if any:

42
43 None.
44

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EVALUATIONS FOR
AGENCY USE ONLY

10. Aesthetics

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

No new structures are being proposed. The additional tanks would be located in the existing 325 Building, which is 12 meters high.

- b. What views in the immediate vicinity would be altered or obstructed?

None.

- c. Proposed measures to reduce or control aesthetic impacts, if any:

None.

11. Light and Glare

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

None.

- b. Could light or glare from the finished project be a safety hazard or interfere with views?

No.

- c. What existing off-site sources of light or glare may affect your proposal?

None.

- d. Proposed measures to reduce or control light and glare impacts, if any:

None.

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR
AGENCY USE ONLY

12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity?

None.

- b. Would the proposed project displace any existing recreational uses? If so, describe.

No.

- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any?

None.

13. Historic and Cultural Preservation

- a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.

No places or objects listed on, or proposed for, national, state, or local preservation registers are known to be on or next to the 325 Building.

- b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.

There are no known archaeological, historical, or Native American religious sites in the 325 Building Area.

- c. Proposed measures to reduce or control impacts, if any:

None.

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EVALUATIONS FOR
AGENCY USE ONLY

14. Transportation

- a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.

Not applicable.

- b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

No. The distance to the nearest public transit stop is approximately 113 meters located near the entrance to the 300 Area.

- c. How many parking spaces would the completed project have? How many would the project eliminate?

The 325 Building has three parking lots. None of the three parking lots would be eliminated.

- d. Will the project require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

No.

- e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No.

- f. How many vehicular trips per day are generated by the completed project? If known, indicate when peak volumes occur.

No additional vehicular traffic will be required because of the expansion of the 325 Hazardous Waste Treatment Units.

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR
AGENCY USE ONLY

- 1 g. Proposed measures to reduce or control
2 transportation impacts, if any:

3
4 None.

5
6 15. Public Services

- 7
8 a. Would the project result in an increased
9 need for public services (for example: fire
10 protection, police protection, health care,
11 schools, other)? If so, generally describe.

12
13 No. Existing services are adequate.

- 14
15 b. Proposed measures to reduce or control
16 direct impacts on public services, if any:

17
18 None.

19
20 16. Utilities

- 21
22 a. Circle utilities currently available at the
23 site: electricity, natural gas, water,
24 refuse service, telephone, sanitary sewer,
25 septic system, other:

26
27 Electricity, telephone, sewer, water, and
28 refuse collection are available at the
29 325 Building.

- 30
31 b. Describe the utilities that are proposed for
32 the project, the utility providing the
33 service, and the general construction
34 activities on the site or in the immediate
35 vicinity which might be needed.

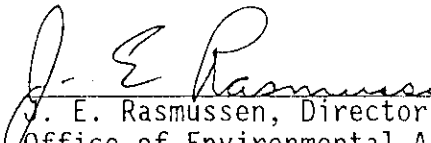
36
37 All utilities for the 325 Building are
38 currently available. No new utility
39 services would be required.
40

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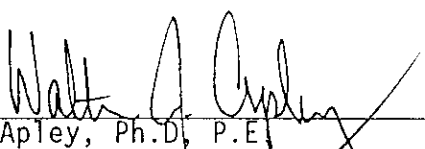
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SIGNATURES

The above answers are true and complete to the best of my knowledge. We understand that the lead agency is relying on them to make its decision.


J. E. Rasmussen, Director
Office of Environmental Assurance,
Permits, and Policy Division
U.S. Department of Energy
Richland Operations Office

11/21/95
Date


W. J. Apley, Ph.D., P.E.
Associate Laboratory Director for Operations
Pacific Northwest Laboratory

10/12/95
Date

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APPENDIX C

SUMMARY OF NOTICES OF COMPLIANCE VIOLATIONS AND THE
U.S. DEPARTMENT OF ENERGY, RICHLAND OPERATIONS
OFFICE RESPONSES

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11/16/95

Enforcement Actions

Page 1

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford	5/6/84	RCRA	Formal	Closed	Ecology	State Order DE 84-267 required the U.S. Department of Energy (DOE) to allow the state to access the Hanford Site to conduct formal compliance assessments of nonradioactive hazardous waste facilities.	The first comprehensive compliance inspection of Hanford by the State of Washington occurred on June 11-14, 1985. Since then Ecology has conducted numerous formal compliance assessments of the nonradioactive hazardous waste facilities.
Hanford	12/26/84	RCRA	Formal	Closed	Ecology	State Order DE 84-720 covered several interim status compliance actions associated with nonradioactive hazardous waste facilities.	The action to achieve compliance with this order is complete. Part A applications for the facilities in question were submitted in July 1985. This date met the schedule specified in the order.
Hanford	1/29/85	SWPCA	Formal	Closed	Ecology	State Order DE 85-130 covered alleged violations of state water quality statute Revised Code of Washington (RCW) 90.48 related to Plutonium Finishing Plant (PFP) chemical sewer releases.	DOE did not acknowledge the applicability of state statutes to its activities at that time. Therefore, no specific steps were taken in response to the order, although a discussion of the circumstances was provided as a matter of comity.
Hanford	1/15/86	--	Formal	Closed	Ecology	State Order DE 85-677 covered alleged violations of state water quality statute RCW 90.48 related to Plutonium Uranium Extraction (PUREX) chemical sewer releases.	By May 1, 1986, all facility modifications and procedural changes specified in the order were in place.
Hanford	2/26/86	--	Formal	Closed	Ecology/EPA	State Orders DE 86-132 and DE 86-133 and EPA Order 1085-10-07-3008 (followed by Consent Order with the State, DE 86-133) covered RCRA waste accumulation, groundwater monitoring, and interim status closure plans.	DOE, Richland Operations Office (RL), submitted a plan to Ecology on March 7, 1986, assuring that the storage of dangerous wastes was conducted in accordance with state regulations. Groundwater monitoring networks were installed at various facilities. The groundwater sampling programs associated with these groundwater monitoring networks are in compliance with RCRA. The required closure/post-closure plans were submitted to Ecology in November 1985.

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Hanford	11/21/86	TSCA	Formal	Closed	EPA	A Complaint and Notice of Opportunity for Negotiation was issued against RL alleging violations of provisions for use of hydraulic systems in the PCB regulations. The complaint followed a May 21, 1986, inspection by the U.S. Environmental Protection Agency (EPA) that was conducted to determine whether activities were in compliance with PCB regulations.	RL responded to the Complaint on January 7, 1987, with verification that the 3760 Building reservoir was drained and refilled with new, non-PCB hydraulic oil on December 4, 1986. RL stated in the letter that they believed no further action or documentation was required.
Hanford	10/30/87	RCRA	Formal	Closed	Ecology	State Order DE 87-295 covered state dangerous waste releases (mixed waste) to the 216-A-36B Crib.	All discharges were stopped and the crib was permanently closed to use. Wells drilled in accordance with dates set forth in the order (June 1, 1986) and regular sampling are ongoing. The part A permit for the facility was submitted February 2, 1988.
Hanford (WHC)	4/11/89	RCRA	Formal	Closed	Ecology	Ecology notified RL and Westinghouse Hanford Company (WHC) of a Notice of Violation within three areas based on their April 10-11, 1989, inspection of B Pond and the Nonradioactive Dangerous Waste Landfill.	Three findings were identified: (1) the need to construct at least a continuous single-strand rope fence with warning signs around B Pond and each of the three associated lobes; (2) the need to repair a 25-foot breach in the security fence surrounding the Nonradioactive Dangerous Waste Landfill; and (3) the need to evaluate the wooden pier over the 216-A-29 Ditch for stability and to establish load limits for its use. The single-strand rope fence with appropriate warning signs has been installed around B Pond and its three lobes. The fence at the Nonradioactive Dangerous Waste Landfill has been repaired. The wooden pier over the 216-A-29 Ditch has been taken out of service. "DANGER - KEEP OFF" signs have been posted, and the structures have been barricaded.

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Hanford (WHC)	6/12/89	RCRA	Formal	Closed	Ecology	Ecology notified RL and WHC of a Notice of Violation within two areas based on their June 12, 1989, inspection of the 183-H Basins and 216-S-10 Pond and Ditch.	Two findings were identified: (1) the need to construct at least a continuous single-strand rope fence with appropriate warning signs around the 216-S-10 Pond and Ditch before August 15, 1989; and (2) the need to stabilize two corroded and leaking drums containing mixed waste located at the 183-H Basins. A single-strand barrier rope was installed with the appropriate warning signs around the 216-S-10 Pond and Ditch. The contents of the leaking drums were removed and repackaged in appropriately prepared drums. An inspection was conducted on the other drums containing dangerous waste at the 183-H facility and no other irregularities were noted. The Central Waste Complex, which receives 183-H dangerous waste drums, was inspected and no irregularities were noted. An analysis also was conducted on the probable cause of the corrosive material found on the drums. The results were presented to Ecology.
Hanford (WHC)	7/20/89	RCRA	Formal	Closed	Ecology	Ecology notified RL and WHC of a Notice of violation within three areas based on their July 20, 1989, inspection of the 216-A-29 Ditch, 216-B Pond, and the Central Waste Complex.	Three findings were identified: (1) the need to construct, at a minimum, a continuous single-strand chain fence with appropriate warning signs around the 216-A Ditch by September 30, 1989; (2) four radiation warning signs were found unsecured on the ground near the 216-A-29 Ditch and 216-B Pond facilities; and (3) 10 waste drums at Central Waste Complex were found to have exceeded the 90-day accumulation period while at the generating facility.

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							<p>A continuous single-strand barrier was installed around the 216-A-29 Ditch and 216-B Pond. The unsecured signs have been reposted. Periodic inspections will be conducted to identify necessary corrective actions such as unsecured signs.</p> <p>The 10 waste drums that exceeded the 90-day accumulation period were identified as originating from PFP. These drums were partially characterized and transferred to the Central Waste Complex for proper storage. A letter identifying the dangerous and mixed waste satellite and less-than-90-day accumulation areas on the Hanford Site was transmitted to Ecology.</p>
Hanford (WHC)	4/25/90	HMTA	Formal	Closed	DOT	On April 25, 1990, the Department of Transportation issued a Federal Railroad Administration Probable Notice of Violation against WHC for violating the Hazardous Materials Transportation Act, and fined WHC \$3,000.	The procedures were corrected to the satisfaction of DOT and, after negotiations, the fine was reduced to \$2,100, which was paid by WHC.
Hanford (WHC)	12/10/90	RCRA	Formal	Closed	Ecology	On December 10, 1990, Ecology notified RL and WHC of a Notice of Noncompliance for returning 68 problem drums from the Central Waste Complex to the generator, the 183-n Basins. Ecology did not take any formal action, but requested that the 68 drums be repackaged and returned to the Central Waste Complex before December 25, 1990.	RL received concurrence from Ecology to extend the deadline to January 15, 1991. The repackaging of the drums was initiated on December 18, 1990; however, this effort was hampered by unfavorable weather conditions. Eight additional working days were lost due to high winds, snow, and rain. All 68 of the problem drums were subsequently repackaged and returned to the Central Waste Complex by January 25, 1991. Ecology was both verbally notified by WHC and officially notified by RL of this additional delay.

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Hanford (WHC)	10/07/91	CAA	Informal	Closed	DOH	DOH conducted a technical review of radioactive air emissions from PFP July 16-18, 1991. One finding and five observations were identified.	A letter from DOH to RL on September 19, 1994, formally closed this item.
Hanford (WHC)		NPDES	Informal	Closed	Fisheries	In March 1991, RL began construction of a new filter backwash pond in the 300 Area. A component of this construction project was a new outfall to the Columbia River. Army Corps of Engineers' approval was secured for the outfall. An NPDES permit has been applied for, and all the necessary NEPA documentation is in place; however, RL failed to apply for the necessary hydraulic project permit approval from the Washington State Department of Fisheries (Fisheries) and for a temporary water quality modification permit from Ecology before construction of the outfall.	<p>Fisheries performed an inspection of the construction project in June 1991. As a result of the inspection, Fisheries considered this activity as a violation because a portion of the construction was performed below the high-water mark on the Columbia River without a permit.</p> <p>RL was instructed by Fisheries to do the following: (1) place a screen on the outlet of the outfall to prevent fish from trying to swim up the pipe; (2) repair the damage to the vegetation that occurred during construction; and (3) contact Ecology on whether a water quality modification permit should be applied for after construction is complete.</p> <p>A screen was placed on the outfall in December. A new hydraulic project permit has been received to allow for new trees to be planted. Trees were planted to replace the damaged vegetation during March. Ecology has indicated construction of the outfall has already occurred.</p> <p>Although this was considered a violation, no citation was issued to RL or its contractors. Fisheries also stated that there was no significant environmental impact due to the construction of this outfall.</p>

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Hanford (WHC)	5/14/92	RCRA	Informal	Closed	Ecology	Ecology issued an inspection report for Tank 241 -SY-101 that alleges RL was in violation of State Dangerous Waste Regulations (WAC 173-303). These violations included the failure to inspect monitoring systems, failure to provide and operate adequate leak detection, failure to allow inspectors access to training records, and failure to properly identify personnel in the training plan.	<p>RL has issued three responses to the state regarding the alleged violations according to the schedule in the inspection report. RL has completed all corrective actions as required by Ecology. No formal notification indicating satisfactory completion of the corrective actions has been received by Ecology.</p> <p>Correspondence from Ecology in October 1994 indicated this item would remain open until a followup inspection could occur.</p> <p>Ecology notified WHC by e-mail on October 23, 1995, that they now consider this issue closed.</p>
Hanford (WHC)	7/16/92	RCRA	Informal	Closed	Ecology	Ecology issued an inspection report for an overflow of PUREX tank F18. The primary violations that were alleged included lack of spill reporting, failure to inspect monitoring systems, and lack of adequate secondary containment and overfill prevention controls.	<p>A letter was sent April 28, 1993, from Ecology to RL and WHC stating formal closure of this item.</p>
Hanford (WHC)	8/65/92	CAA	Informal	Open	DOH	DOH conducted an audit of 200 East Area Tank Farms during March and April 1992 and identified 21 findings, 10 observations, and 9 best management practices related to airborne radioactive emissions from the tank farms.	<p>The primary findings centered around potential shortcomings in compliance with the reasonably available control technology engineering standard. RL has completed corrective actions to close these findings.</p> <p>A response was sent to DOH in November 1992. On September 2, 1994, DOH sent a letter to RL indicating that 10 findings were still open, and that the remaining observations (now called findings Level IV) and BMPs were closed. The letter requested that the remaining open items be completed by November.</p>

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							1. 1994.
							Tank farms personnel met with DOH on November 8, 1994, to discuss the original responses and were unable to close any of the items at that time. They met again on November 22, 1994, to discuss a closure plan. Tank farms personnel agreed to submit responses by January 31, 1995.
							On March 3, 1995, DOH sent RL a letter closing three findings. The letter stated DOH was unsatisfied with the other responses to the findings, and provided additional guidance to respond to these items.
							Tank Farms personnel have been preparing a response, which has not been submitted to RL yet.
Hanford (WHC)	9/22/92	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for T Plant that alleges RL and WHC were in violation of WAC 173-303. These violations included failure to meet waste generator and accumulation standards such as recordkeeping inspections, use and management of containers, waste designation, and spills and discharges.	RL and WHC have issued a response according to the schedule described in the inspection report. Most corrective actions have been completed. Ecology has noted T Plant's efforts to resolve their violations and has officially closed this enforcement action.
Hanford (WHC)	9/23/92	CAA	Informal	Closed	DOH	DOH issued a report detailing 15 action items from an investigation concerning an unresolved safety question at the B Plant main stack ventilation system.	These action items included providing a response to the following: improper notification of DOH for emission control system modifications, potentially inadequate emission control system, and improper ventilation sealing systems. A response was provided by RL within the designated 45-day time period. Five of the action items have been completed to the satisfaction of DOH.

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							Closure of the remaining 10 action items will occur after completion of corrective actions and ongoing negotiations with DOH. A followup inspection occurred on June 22, 1994, and on September 16, 1994. DOH sent a letter to RL formally closing this inspection.
Hanford (WHC)	10/06/92	CAA	Informal	Closed	DOH	DOH issued a report for an audit performed at the Uranium Trioxide Facility that identified five minor findings.	These findings were related to sampling data collection, data reporting, and monitoring equipment calibration. RL issued a response within the designated 45-day time period. Two of the findings have been closed to the satisfaction of DOH.
Hanford (WHC)	10/23/92	TSCA	Formal	Closed	EPA	The EPA issued a Notice of Noncompliance based on an inspection conducted in September 1991. One violation related to the cleanup of a PCB spill was identified.	DOH sent a letter to RL (correspondence #9401923) dated February 11, 1994, to close the remaining items identified during the surveillance. On November 13, 1992, RL responded to the Notice of Noncompliance. RL stated in the response that the cleanup of the PCB spill was completed on September 28, 1991, not October 1, 1991, as alleged in the Notice of Noncompliance. RL also outlined corrective actions to ensure that cleanup of PCB spills are initiated and completed within the required 48 hours.
Hanford (KEH)	10/27/92	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter to RL and Kaiser Engineers Hanford (KEH) alleging violations of WAC 173-363. These violations	On November 25, 1992, EPA sent a letter to RL stating they were satisfied with RL's response and corrective actions and closed the issue. RL and KEH issued a response within the designated time period. A letter mailed on January 14, 1993, from Ecology to RL formally

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						included failure to meet the waste generator and accumulation standards such as waste designation, personnel training, recordkeeping, and the use of a management of containers.	closed this item.
Hanford (PNL)	10/30/92	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for the 305-B storage facility alleging RL and Pacific Northwest Laboratory (PNL) are in violation of WAC 173-303.	The violations included improper waste designation, an inadequate contingency plan, an inadequate waste inventory, improper container labeling, and improper storage of waste according to their fire code. RL and PNL issued a response that disputed all findings. These findings were resolved in a letter sent from Ecology to RL on April 7, 1993.
Hanford (WHC)	11/12/92	RCRA	Informal	Closed	Ecology	Ecology issued a letter alleging that RL and WHC are in violation of WAC 173-303. These violations included leak detection, lack of secondary containment, delayed notification and reporting, and inadequate personnel training at the single-shell tanks.	Ecology also prepared a Tri-Party Agreement change control form establishing enforceable milestones to address the violations. RL and WHC have issued a response requesting that negotiations begin to address the proposed milestones.
Hanford (WHC)	1/15/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for issues related to the storage of mixed waste in the 241-SY-101 Tank Farm.	The violations noted included exceeding the waste accumulation limit of 120 days, and compliance problems associated with generator waste storage. RL and WHC have issued a formal response. No additional actions are necessary.
Hanford (WHC)	2/02/93	CAA	Formal	Closed	DOH	DOH issued a Notice of Violation (NOV) for radioactive air emission issues related to the proposed fuel encapsulation activities at the 100-KE fuel storage basins.	The NOV stated that RL and WHC have initiated work that directly supports fuel encapsulation without approval of DOH. The NOV formally directed RL and WHC to stop all work at the 100-KE Basins immediately. RL and WHC formally responded to the NOV, and a Notice of Construction permit was issued in the fall of 1993.

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Hanford (WHC)	2/03/93	CAA	Formal	Superce	EPA	EPA issued a Compliance Order to RL and its contractors alleging noncompliance with the National Emission Standards for Hazardous Air Pollutants for radionuclides.	EPA and RL negotiated a Federal Facility Compliance Agreement (FFCA) on February 7, 1994, to allow RL to confirm compliance or meet the compliance requirements of 40 CFR 61, Subpart H. The FFCA superseded the compliance order and this will no longer be tracked as an open item.
Hanford (WHC)	3/10/93	RCRA	Formal	Closed	Ecology	Ecology issued an Order and Notice of Penalty Incurred and Due for failure to adequately designate approximately 2,000 containers of solid waste.	<p>The Notice of Penalty stipulated a penalty of \$100,000. RL disputed portions of the Order and Notice of Penalty. RL and Ecology have agreed to resolutions to the disputed portions, and these resolutions have been agreed to by the Washington State Pollution Control Hearing Board, which issued a settlement agreement modifying the Order and Notice of Penalty.</p> <p>The settlement agreement for the Compliance Order required submittal of a Waste Analysis Plan (WAP) to confirm or complete the designation of the waste in question. Extensive negotiations regarding the content of the WAP occurred between RL and Ecology, and final approval was granted by Ecology on November 1, 1993. Confirmation or completion of the waste designation, following the process established by the WAP, must be completed by September 1, 1994.</p> <p>Negotiations regarding an alternative to the payment of the \$100,000 penalty resulted in an agreement that allows RL to set up an Environmental Protection Scholarship in the amount of \$40,000 at Columbia Basin College, and payment to PWA and the Washington</p>

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							Department of Wildlife to plan for and carry out a sagebrush revegetation effort on the Hanford Arid Lands Ecology Reserve
Hanford (WHC)	5/12/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for alleged violations related to a spill of ethylene glycol at the 309-E Building to the 300 Area Process Trench.	<p>On August 24, 1994, RL transmitted a package to Ecology that completed the actions required by the Order.</p> <p>The alleged violations were related to immediate reporting of the incident and access to information. RL prepared a response to this incident within the required time period and considered that all corrective actions required by Ecology were completed. Since then, Ecology indicated that they believed further information was required for them to close this item. On March 22, 1995, RL transmitted the additional information to Ecology. The letter provided answers to two questions posed by Ecology regarding the ethylene glycol spill at the 309 Building. Ecology now considers this item closed.</p>
Hanford (WHC)	5/24/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for alleged violations of various regulations related to tank system compliance at Tank 241-BX-111.	<p>RL has prepared responses to the letter and has committed to pumping the remaining liquids from the tank. Liquid pumping was initiated in October 1993 and initially was expected to be completed in January 1994. This date was extended to April 30, 1994.</p> <p>After all the liquid was believed to be pumped, pictures were taken and a pool of free liquid was found to be remaining. This was pumped, and it amounted to about 5,000 gallons of supernatant. As of July 12, 1994, all the supernatant liquid had been removed.</p>

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							<p>and pumping was continuing on the interstitial liquid. WHC expected this last stage of pumping to be done by the end of July.</p> <p>New photographs were taken after this final pumping, and again liquid (estimate approximately 10,000 gallons) was seen in the tank. Additional pumping is planned to occur after further integrity testing of the transfer line.</p> <p>In March 1995, this tank was declared interim stabilized. Ecology notified WHC by e-mail on October 23, 1995, that they now consider this issue closed.</p>
Hanford (WHC)	7/09/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for alleged violations of the generator accumulation standards of WAC 173-303-200 at T Plant.	These alleged violations occurred during the repackaging of unknown containers that were generated in Tank Farms. RL has completed all corrective actions as required by Ecology. Additional correspondence from Ecology requested more information related to six repackaged waste containers. On December 2, 1993, RL submitted this information to Ecology, and Ecology has indicated satisfaction with this response.
Hanford (WHC)	8/24/93	RCRA	Informal	Closed	Ecology	Ecology was notified on August 12, 1993, of a request to extend the 90-day accumulation period for T Plant waste because of the Tank Farms safety stand down. Ecology denied the extension because they believed the necessary requirements were not satisfied in a letter they received August 16, 1993, from RL.	On September 22, 1993, approval of the 30-day extension was received. The tank car was shipped on September 17, 1994, as agreed to with Ecology. This item is now closed.

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Hanford (WHC)	10/15/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for alleged violations of the transporter requirements of WAC 173-303-190 at the PUREX Facility.	These alleged violations occurred while the waste was being stored in a tank trailer pending approval from Idaho to accept the waste. RL transmitted a letter to Ecology on June 28, 1994 (9404281), stating that items in the compliance letter are closed. RL now considers this item closed.
Hanford (WHC)	10/18/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for alleged violations of the treatment, storage, and disposal requirements of WAC 173-303 at PUREX.	The primary violations involved not removing liquid from secondary containment within 24 hours and storing wastes in a unit not permitted for storage. These alleged violations occurred while waste was being stored in Tank F18 and Tank F16. Transfer of waste from Tank F16 and Tank F18 to Tank Farms was initiated on October 22, 1993. A total of six transfers were required to remove the waste from Tank F16. The final transfer from Tank F16 was completed on November 1, 1993. RL provided Ecology with a letter on December 14, 1993, to document that Tank F16 was emptied. The letter stated that "with the removal of waste from Tank F16 completed, RL considers this action closed."
Hanford (WHC)	10/18/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for alleged violations of the generator accumulation requirements of WAC 173-303-200.	The violations resulted from a reclassification of four process tanks at the Plutonium Reclamation Facility (PRF) as waste accumulation tanks. Ecology required the implementation of a waste tracking system, that tanks be labeled as hazardous waste accumulation tanks, and providing direction to PRF Operations regarding the regulatory status of PRF waste tanks. The first item has been completed. RL sent a letter to Ecology in late November 1993, which requested information on two excursions in

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							WAC 173-303-071(3) that may allow reclassification of PRF waste tanks to non-RCRA status.
							On January 13, 1994, Ecology responded with a letter that stated the above-mentioned tanks were process tanks and, therefore, not subject to generator waste accumulation requirements under the WAC.
Hanford (WHC)	10/26/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for alleged violations of the generator accumulation requirements of WAC 173-303-200.	The compliance letter resulted from a Hanford-wide inspection of temporary storage and satellite accumulation areas. Several findings and recommended corrective actions were noted in the inspection. WHC has completed these corrective actions.
							At the 1164 Facility, one finding was identified regarding container records. On November 5, 1993, a copy of the records was filed at the facility. The final report to close this item was issued on December 16, 1993. A letter from Ecology on February 17, 1994, formally closed this item.
							At the 1713-H satellite storage area, three findings were identified, and two findings at the 321 Facility were identified. With regard to the 1713-H Facility, RL sent a letter to Ecology on November 15, 1993, listing the corrective actions taken and stating that RL believed these actions "fully resolve the inspection findings." With regard to the 321 Facility, this was a temporary facility that has been closed, thereby eliminating this issue.

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Hanford (WHC)	10/27/93	CAA	Informal	Closed	DOH	DOH issued a compliance letter after an inspection of the 291-U-1 stack monitoring system on October 1, 1993.	The letter identified two observations. RL had believed that only findings required a formal response, and did not formally respond to the observations. An August 1994 audit by DOH upgraded all former observations to findings (level IV) which required RL to provide a response.
Hanford (WHC)	10/29/93	CAA	Informal	Closed	DOH	DOH issued a report of a surveillance conducted at PUREX during August 1993 that identified one finding related to a lack of auditable procedures and three best management practices (BMP), one related to tracking sampling instrument serial numbers by location, and two related to clarifying sampling procedures.	A response was provided to RL on January 20, 1995. On July 13, 1995, DOH transmitted a letter closing this inspection. The finding was issued because the health physics procedure document, WHC-IP-0718, which had recently replaced WHC-IP-0692, did not contain PUREX-specific procedures. PUREX Health Physics implemented a field change on November 9, 1993, to incorporate the PUREX-specific procedures into the -0718 document. A followup inspection scheduled for July 18, 1994, to determine resolution of this issue was canceled since DOH had indicated they were satisfied with the corrective action.
Hanford (WHC)	11/17/93	RCRA	Informal	Closed	Ecology	On November 17, 1993, Ecology issued a compliance letter alleging inadequate controls for preventing nonroutine releases of hazardous substances to the environment from WHC-managed facilities in the 300 Area. The subject letter was received following a release of ethylene glycol to the 300 Area Process Sewer from the 300 Building in October 1993.	Closure of this finding was documented in a telephone memorandum on October 17, 1994. RL requested WHC to submit a written response to the subject letter by December 22, 1993 (this date was amended to December 30, 1993). On December 30, 1993, WHC responded to RL with a letter that provided an assessment of the potential for non-routine releases of hazardous substances to the environment from the 300 Area WHC- and AEC-managed facilities.

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							<p>Where hazardous materials were present, the control systems for preventing releases to the environment were evaluated. If the control systems were found to be inadequate, plans and schedules to upgrade the systems were developed. The planned upgrades are scheduled for completion before the start of the 300 Area Treated Effluent Disposal Facility, projected for December 1994. The assessment provided to RL included descriptions of each affected facility and the action required to correct the situation.</p> <p>Ecology has said this issue was satisfied with the submittal of RL's corrective actions, but indicated a followup inspection to verify compliance could occur.</p> <p>On November 17, 1993, Ecology met with RL to discuss alleged deviations from Section 1.4 of the WAP, which requires RL and Ecology to approve changes. Also discussed was a concern regarding waste management training, a request for desk instructions, and a list of responsible persons. The information originally was requested for December 1, 1993. Ecology agreed to delay the response until December 8, 1993, and RL issued the response on that date. The response stated that all proposed changes to the WAP will be communicated to Ecology as requested. The letter also addressed the other concerns Ecology had, and made recommendations to assemble a technical team to deal with issues surrounding implementation of the WAP before</p>
Hanford (WHC)	11/17/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for alleged violations in implementing the WAP.	

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							they became concerns.
Hanford (WHC)	12/06/93	CAA	Informal	Closed	DOH	DOH issued a compliance letter following a surveillance on October 6, 1993, at the Fast Flux Test Facility (FFTF), which identified two findings and two BMPs. The letter requested a response from RL within 45 days.	<p>On January 5, 1994, Ecology closed this item. One of the findings was that calibration tags were not on monitoring instrumentation, and the other finding noted that some monitoring instruments had difficulty remaining in calibration because of vendor problems. Recommended corrective actions were provided in the compliance letter.</p> <p>RL provided DOH a response on March 2, 1994.</p> <p>RL transmitted a new response to DOH on January 31, 1995. On July 13, 1995, DOH transmitted a letter closing this inspection.</p>
Hanford (WHC)	12/07/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for allegations that improvements (target actions) to be performed at T Plant as part of the Dangerous Waste Part A Permit Application were found to be either incomplete or unsatisfactory during a December 2, 1993, inspection.	<p>This target action, "Implement Periodic Visual Inspection and Static Leak Test Program for 2706-T and 211-T Tanks," was to be completed by October 1993. Ecology has required implementation of effective visual inspection and leak test programs for the 2706-T and 211-T sumps by December 15, 1993. Ecology also required the completion of three corrective actions by January 15, 1994; specifically, repair of the backflow preventer leaking to the 2706-T sump, repair of the leak detection device for 2706-T, and report on the progress of installing or instituting leak detection for the 211-T sump.</p> <p>This item was put on hold while the alleged violations were investigated. On November 7, 1994, Ecology transmitted a letter to RL and</p>

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Hanford (WHC)	12/13/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for an inspection conducted November 18-22, 1993, at the Transuranic Waste Storage and Assay Facility (TRUSAF) to determine compliance with interim status requirements under WAC 173-303, and to status current activities with respect to the Dangerous Waste Part B Permit Application.	<p>WHC that followed a followup inspection on October 18, 1994. No violations were noted. RL considers this item closed.</p> <p>Alleged violations included (1) failure to maintain emergency equipment in accordance with the facility contingency and emergency plan, (2) failure to maintain operating records in a manner sufficient to locate wastes within the facility, (3) failure to label containers with hazardous waste labels or in a manner to adequately identify major risks associated with the contents of the containers, and (4) failure to store containers within a compliant secondary containment system.</p> <p>The compliance letter stated that RL and WHC needed to correct these findings by March 18, 1994.</p> <p>On February 4, 1994, RL sent a letter to Ecology providing a status of the four corrective actions. RL considers the first two items closed. RL requested an extension to April 30, 1994, for the third item, and stated that the fourth item would be completed by March 14, 1994.</p> <p>A unit managers' meeting was held on June 1, 1994, which provided information indicating the final two items have been completed.</p> <p>On October 18, 1994, Ecology sent a letter to RL formally closing this item.</p>

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Hanford (WHC)	12/17/93	CAA	Informal	Closed	DOH	DOH conducted an audit of air monitoring instrumentation adequacy and calibration on June 28 - July 2, 1993. DOH believes past audits and surveillances have identified instrumentation out of calibration.	<p>The audit revealed two findings, five observations, and five BMPs. DOH requested RL's response, including a corrective action plan, by February 20, 1994.</p> <p>On February 16, 1994, WHC provided RL with a response to DOH. The response stated that one finding would be resolved by March 18, 1994, and the other by April 30, 1994. Completion dates were provided for the findings and BMPs not already resolved.</p> <p>On September 5, 1994, DOH sent a letter to RL stating closeout of all the open items but one finding. DOH is requesting response to this last item by November 1, 1994.</p> <p>WHC told RL on November 14, 1994, that this deadline could not be met, and RL agreed to inform DOH that a response would be submitted by January 31, 1995. On January 20, 1995, a response was submitted to RL. DOH formally closed this inspection in a letter transmitted August 25, 1995.</p>
Hanford (WHC)	1/31/94	CAA	Informal	Closed	DOH	DOH issued a compliance letter that followed an inspection of the 242-S Evaporator and SY Tank Farm emission units on November 30 and December 1, 1993.	<p>Three observations and one BMP were identified. RL had believed that only findings required a formal response, and did not formally respond to the observations. An August 1994 audit by DOH upgraded all former observations to findings (level IV), which required RL to provide a response.</p> <p>RL submitted a response to DOH on January 25, 1995. On July 13, 1995, DOH transmitted a letter closing this inspection.</p>

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Hanford (WHC)	1/27/94	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for alleged violations identified during an inspection on December 9, 1993, at the Hanford Fire Department to determine compliance with contingency plan requirements under WAC 173-303 for hazardous and/or mixed waste facilities.	<p>The sections of the WAC that RL and WHC were alleged to be out of compliance with are 173-303-350(2), -350(3), and -350 (4). The compliance letter stated that contingency plans for 2715EA, 1177, 321, 384, and 284W did not incorporate the WAC requirements. Additionally, the letter stated that copies of contingency plans for 284E, 284W, and 2715EA were not kept at the Hanford Fire Department as required, and they were not on the Hanford Local Area Network (HLAN).</p> <p>The compliance letter requested corrective actions to be complete by April 15, 1994.</p> <p>On March 23, 1994, WHC provided RL with a letter for Ecology in response to these allegations, and RL sent the letter to Ecology on March 28, 1994. The letter presents a revised RL/WHC contingency planning program, and outlines the corrective actions RL will take by May 31, 1994, to close this item.</p> <p>WHC/RL completed corrective actions as planned according to schedule. Ecology notified WHC by e-mail on October 23, 1995, that they now consider this issue closed. The audit resulted in three observations (now referred to as findings level IV): (1) carbon absorber units inspected (Building 340) did not have test ports or indication (tags) of efficiency test performance; (2) the electric pre-heater upstream of the main filter bank for the 340 building was not</p>
Hanford (WHC/PNL)	2/01/94	CAA	Informal	Closed	DOH	DOH officials conducted an audit on August 23, 1993, of the 300 Area emission units.	

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							<p>operating to limit humidity; and (3) calibration was not indicated (tags) on gauges used to monitor performance of HEPA filters (WHC and PNL facilities). Corrective actions were included in the letter report.</p> <p>RL provided a letter to DOH on December 1, 1994, responding to the three items. Corrective actions also were provided. Another response letter containing additional requested information was sent to DOH on December 9, 1994.</p> <p>On July 13, 1995, DOH transmitted a letter closing this inspection.</p> <p>The alleged violations are summarized below.</p> <p>1) RL and WHC "failed to make training records available for inspection...to verify that employees involved in the backlog waste program have received training...."</p> <p>2) RL and WHC "failed to make training records required by Chapter 173-303-330 WAC available for inspection at all reasonable times per Chapter 173-303-380(3[a])."</p> <p>Ecology's corrective actions stated in the "voluntary compliance letter" involve providing the requested training records to Ecology and then maintaining the appropriate training records in the 200 West Area, and keeping them available for future inspections.</p>
Hanford (WHC)	2/23/94	RCRA	Informal	Closed	Ecology	<p>Ecology issued a compliance letter alleging violations of facility recordkeeping requirements for the Backlog Waste Program.</p> <p>The alleged violations resulted from an Ecology inspection on February 18, 1994, when Ecology requested copies of training records.</p>	

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Hanford (RL/COE)	3/09/94	RCRA	Formal	Closed	Ecology	Ecology issued an Order (No. DE 94NM-063) and Notice of Penalty incurred and due (No. DE 94NM-062) against the U.S. Army Corps of Engineers (COE) for disposing dangerous waste at the Richland Landfill, and against DOE for not providing adequate dangerous waste training to COE employees.	<p>On April 14, 1994, Ecology sent a letter to RL and WHC stating that their investigation of training record accessibility for the Backlog Waste Program was completed and the issue has been closed.</p> <p>Ecology has assessed a penalty of \$9,500 against DOE and a \$6,000 penalty against COE. The fines stem from the accidental dumping of dangerous waste at the landfill as part of the cleanup activity ongoing at the North Slope. The incident occurred late in 1993.</p> <p>On April 15, 1994, Ecology sent a letter to RL and COE stating satisfaction that the corrective items identified in the order had been completed, and approved the restart of dangerous waste management work on the North Slope. Ecology also requested in the letter that before the generation or potential generation of hazardous or mixed waste at identified past-practice waste sites, that Waste Control Plans be submitted to them for approval. Ecology stated that the "letter serves as a notice of completion of Order requirements," except for the ongoing requirements of the Waste Control Plans, and stated that the "entire case will be resolved upon payment" of the Penalty.</p>
Hanford (WHC)	4/07/94	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter to RL and WHC alleging noncompliance with WAC 173-303-330, Personnel Training.	<p>The allegations followed an inspection conducted at tank farms March 17-18, 1994, to determine compliance with generator requirements. The inspector stated that at the time of the inspection, a random sample of training records was selected and that approximately half of those were found to be</p>

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							<p>deficient. The action item in the letter called for RL and WHC to review the training of tank farms personnel by July 1, 1994, and to complete and document all required training.</p> <p>On June 29, 1994, RL sent Ecology a letter (9404279) stating that 95 percent of the tank farms personnel had completed the required training, and that all remaining personnel would be limited to work not directly affecting dangerous waste management activities until their training was completed.</p> <p>Ecology conducted a follow-up inspection on July 19, 1994, and indicated satisfaction with this issue and said they consider this closed.</p>
Hanford (ERC)	4/14/94	RCRA	Informal	Open	Ecology	Ecology issued a compliance letter to RL and WHC on April 14, 1994, which followed an inspection conducted on February 7-8, 1994, to assess completion of Milestones 21, 22, and 23 of the Tri-Party Agreement. The compliance letter alleged seven violations of WAC 173-303: (1) WAC 173-303-300, General Waste Analysis; (2) -380, Facility Recordkeeping; (3) -310, Security; (4) -630, Use and Management of Containers; (5) -320, General Inspection; (6) -350, Contingency Plan and Emergency Procedures; and (7) -640, Tank Systems.	<p>Ecology's concerns were centered around RCRA interim status requirements being relaxed on the facilities that were inspected, which are scheduled for closure or are undergoing a change in mission. Ecology's concerns are that relaxed management of hazardous waste during these periods may cause a threat to human health or the environment. Five corrective actions were included in the letter, three to be completed within 30 days, two within 60 days, and one within 180 days.</p> <p>On July 26, 1994, Ecology sent a letter to RL stating that four of the five items had been satisfactorily completed. The fifth item, to construct a barrier around 100-b ponds, was</p>

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							<p>discussed at the unit managers' meetings in July. Ecology stated in the letter referenced in this paragraph that the barrier was dependent on the hazard posed by contamination within the active portion of the facility. This last item is now being resolved by the ERC Team. If RL/BHI can demonstrate that contamination would not occur if the area were disturbed, then the barrier requirement would be waived. Ecology states "if data can be collected, analyzed, and independently validated in a timely manner," they would consider deferring the compliance date of October 10, 1994, to construct the barrier, until the sampling and analytical results were complete.</p> <p>On November 4, 1994, Ecology sent a letter to RL stating that enforcement to construct a barrier would be deferred until June 5, 1995, when validated data is received.</p> <p>Sampling was completed in January 1995. The validation report and raw data were submitted in May 1995, and the Data Evaluation Report was submitted to Ecology by June 5, 1995.</p> <p>Ecology is reviewing the data and indicated in an e-mail message dated October 23, 1995, that they expected closure soon on the barrier issue.</p>
Burrard (WHC)	4/20/94	CAA	Informal	Closed	DOH	DOH issued a compliance letter that followed an inspection at T Plant on March 16, 1994.	One finding and two observations were identified during the audit. RL had believed that only findings required a formal response, and did not formally respond to the

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							<p>observations. An August 1994 audit by DOH upgraded all former observations to findings (level IV), which required RL to provide a response.</p> <p>On April 21, 1995, RL received a letter from DOH that stated the above findings still required a response for this item to be closed. An initial response had been prepared but was not submitted. A new response was prepared by T Plant and submitted to RL, and RL transmitted this response to DOH. On July 13, 1995, DOH transmitted a letter closing this inspection. The letter states that "this investigation was performed under the guise of an environmental assessment rather than a compliance inspection. However, failure to correct the deficiencies may result in a compliance action pursuant to the authorities granted to Ecology by RCW-70-105." Because of this language, RL/WHC decided to handle this letter like a voluntary compliance letter.</p> <p>On June 27, 1994, RL issued a letter that responded to the findings, observations, and requirements. The letter's responses either disputed the findings, etc., or agreed with them and provided corrective actions with completion dates.</p> <p>On August 1, 1995, WHC provided a letter for RL to submit to Ecology stating that all findings, observations, and requirements</p>
Hanford (WHC)	5/18/94	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter to RL and WHC on May 18, 1994, that followed a dangerous waste compliance assessment of the PUREX and UO3 facilities. The assessment was conducted to "determine current compliance with interim status requirements...and to review applicability and appropriateness of requirements for currently permitted vessels, and those vessels that will be added to the PUREX Part A Permit Application." The letter identified 7 findings, 5 observations, and 11 requirements.	

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Hanford (PNL)	8/05/94	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter to RL and PNL on August 5, 1994, that followed a dangerous waste compliance assessment of the 325 Shielded Analytical Laboratory (SAL) on April 12 and 21, 1994.	<p>noted during the compliance assessment have been addressed. WHC and RL consider this closed, though no formal notification of closure has been received from Ecology. Four areas of noncompliance with WAC 173-303 were identified: (1) inadequate closure of containers in storage; (2) facility recordkeeping; (3) interim status permit violations; and (4) the absence of tracking dangerous waste volumes after small quantities of liquid wastes were mixed with large quantities of water in the RMW sewer. Corrective actions and dates for completion were provided by Ecology.</p> <p>The first two items were completed on schedule. The second two items were put on hold until after the facility was restarted, when systems were in place to fully comply with the requirements identified during the inspection. This has occurred and RL considers this closed. No formal notice of closure has been received from Ecology. DOH stated in their letter that a new category of findings, finding level IVs, would be created to replace the former category of observations, which in the past had not been responded to, and that all formerly identified observations from past audits would be changed to finding level IVs as well. The letter did not provide a date for completion of the former observations.</p> <p>On December 7, 1994, RL provided a response to DOH. This submission did not include</p>
Hanford (ALL)	9/02/94	CAA	Informal	Closed	DOH	DOH conducted a sitewide quality assurance audit from August 15-19, 1994, which focused on the overall QA program of RL, WHC, PNL, and BHI. Four findings and two BMPs were identified.	

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							responses to previous audit findings. A letter of clarification committing to a January 31, 1995, response date was provided to RL on December 23, 1994.
Hanford (WHC)	10/18/94	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter on October 18, 1994, to RL and WHC that followed an inspection on August 3, 4, 15, and 29, 1994, at the 204-AR Waste Transfer Facility. This facility is operating as an interim status facility under a revised Part A permit.	On August 25, 1995, DOH transmitted a letter to RL stating all the items identified during this sitewide QA audit were closed. There were three violations noted: (1) emergency procedures were not in place; (2) the contingency plan was not adequate; and (3) transfer operation procedures were inadequate. Additionally, three concerns were noted.
Hanford (WHC)	11/03/94	CAA	Informal	Closed	DOH	DOH issued a compliance letter to RL on November 3, 1994, that followed an inspection at the 200 West Tank Farms on October 19, 1994. The inspection identified three findings and one BMP.	RL responded to the violations in a letter dated November 21, 1994. Ecology notified WHC by e-mail on October 23, 1995, that they now consider this issue closed. During the inspection, stack monitoring systems for five stacks in the 200 West Tank Farms were examined. The findings identified during the inspection are as follows: (1) paper tape on the rotometers can lead to inaccurate flow readings and inaccurate calculations in determining doses; (2) sample flow rate data for two stacks is low, which is in violation of emission monitoring procedures and could lead to under reporting emissions; and (3) several instruments were found to be out of calibration.
							Corrective actions for the findings, and a recommendation to correct the BMP, were provided in the letter, and a response was

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							<p>requested by December 22, 1994. On December 21, 1994, a response was provided to DOH. DOH has said they will conduct a follow-up inspection to verify compliance.</p> <p>On February 14, 1995, DOH transmitted a letter to RL that stated two findings would be closed after a follow-up inspection to verify the corrective actions. The third finding (item 2 above) requires further action to complete it. This additional information was provided to DOH in April 1995.</p> <p>On August 25, 1995, DOH issued a letter to RL stating that the remaining items had been completed and that this inspection was closed.</p>
Hanford (ERC)	11/15/94	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter to RL and Bechtel Hanford, Inc. (BHI), on November 15, 1994, that followed an inspection on November 3, 1994, of dangerous waste generator facilities.	<p>Three facilities were inspected and violations were identified at the 271-U 90-day accumulation area. These are as follows. (1) the spill kit did not contain all the required equipment (WAC 173-303-340); (2) the waste inventory log sheet did not correspond to the labeling on the container (WAC 173-303-210); and (3) the weekly inspection log for the facility indicated no problems were found with any safety and emergency equipment; however, safety and emergency equipment was found to be missing, damaged, or out of certification.</p> <p>Ecology provided corrective actions in the compliance letter and asked RL to provide a "certificate of compliance" indicating</p>

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Hanford (ICF KH)	12/08/94	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter on December 8, 1994, to RL and ICF KH that followed an inspection on November 3, 1994, of satellite accumulation areas in the 200 East and West Areas. These areas are in support of Project W-049H.	<p>closure of the findings. RL transmitted a response to Ecology on January 29, 1995. RL considers this item closed.</p> <p>The letter alleged three violations: WAC 173-303-200(2)(a), the accumulation containers were not under the control of the operator or secured; WAC 173-303-950(2), paint materials in the buckets at the area were left to air dry, which constituted nonpermitted treatment and disposal; and WAC 173-303-145(3)(a)(i) it did not appear that spilled materials were mitigated or prevented. Additionally, five areas of concern were noted in the letter.</p> <p>The corrective actions were to be completed within 24 hours of receipt of the letter, and Ecology requested verification be submitted to them by December 30, 1994.</p> <p>On December 23, 1994, RL transmitted a letter to Ecology to inform them of completion of the corrective actions. On February 8, 1995, Ecology transmitted a letter to RL closing this item.</p>
Hanford (PNL)	2/16/95	RCRA	Informal	Closed	Ecology	Ecology issued a voluntary compliance letter to PNL on February 16, 1995, that followed an inspection on January 23-25, 1995, at the 324 Building's Radiochemical Engineering Cells (REC) and High-Level Vault (HLV) tanks. This inspection was conducted to support resolution of a dispute between the Tri-Parties.	Facility transition negotiations that started in July 1994 have included discussions on the various compliance violations at the 324 Building. On February 7, 1995, the Dispute Resolution Committee agreed that Ecology should issue the voluntary compliance letter to document the areas of noncompliance associated with the 324 REC and HLV tanks, and to restart negotiations of the Tri-Party Agreement milestones to resolve them and close the activities that are noncompliant.

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							<p>The milestones, if agreed to by the three parties (M-89 milestones), will satisfy the regulatory enforcement options for the areas of noncompliance in the 324 Building.</p> <p>The five violations are as follows: (1) failure to ship waste offsite within 90 days of accumulating 55 gallons or more; (2) failure to store radioactive mixed waste in containers or tanks in accordance with WAC 173-303-200(1)(b); (3) failure to meet tank requirements in accordance with WAC 173-303-640(2) & (6); (4) failure to apply for interim status and failure to meet interim status facility standards in accordance with WAC 173-303-400; and (5) failure to prepare land disposal restriction notifications for shipments of radioactive mixed waste offsite in accordance with WAC 173-303-140(2)(a) and 40 CFR 268.7(a)(1).</p> <p>On March 8, 1995, RL transmitted a response to Ecology outlining the measures RL and PNL will take to resolve the compliance issues associated with the 324 Building.</p> <p>On October 23, 1995, Ecology sent WHC an e-mail message stating this issue was closed "subject to issues being resolved via TPA."</p>
Hanford (WHC)	3/28/95	WCAA	Informal	Closed	BCCAA	The Benton County Clean Air Authority issued a Notice of Violation to WHC on March 28, 1995.	<p>The NOV stated WHC was in violation of WAC 173-425-070(4), which allows local air authorities to restrict conditions for burning. On February 25, 1995, burning at the 1250 Building (as a training exercise assumed by the Hanford Fire Department)</p>

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							continued past the time authorized by the Special Burning Permit. The NOV requires a response in 30 days.
Hanford (WHC)	4/20/95	CAA	Informal	Closed	DOH	On April 20, 1995, RL received a compliance letter from DOH that followed an inspection at the Waste Sampling Characterization Facility (WSCF) on April 3, 1995. The letter identified two findings.	On April 24, 1995, the BCCAA transmitted a letter to WHC's Hanford Fire Department that stated further enforcement action would not be required. This item is now closed. The first finding was a violation of WAC 246-247-075, Quality Assurance. Two compliance air samples from an unplanned release did not contain chain of custody requirements, and correct procedures were not followed for the two samples. The second finding also was a violation of WAC 246-247-075. There was no air sample procedure for unplanned releases.
Hanford (RL)	4/25/95	CAA	Informal	Open	DOH	DOH issued a compliance letter to RL on April 25, 1995, that followed a visit with the engineering staff at ICF KH and WHC on March 15, 1995. One finding was identified.	DOH transmitted a letter to RL on August 25, 1995, that stated this item was closed. DOH inspectors reviewed a design project. The finding is a result of DOH's belief that RL does not provide adequate oversight and control of the project. DOH said in the finding that RL needed to resolve contractor differences in calculations of potential to emit for the project.
Hanford (PNL)	5/03/95	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter to PNL on May 3, 1995, that followed an inspection of the 331 Building in January and February 1995. The inspection followed the issuance of an Unusual Occurrence Report filed by PNL. The letter identified five violations.	RL is preparing a response to this finding. PNL filed the Unusual Occurrence Report after a drum repackaging event occurred in which a pressurized drum was improperly opened, resulting in damage to the facility, worker contamination, and release of radioactive materials. The five violations are as follows: (1) failure to properly designate

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							<p>waste; (2) failure to overpack containers; (3) accumulating waste onsite for greater than 90 days without proper hazardous waste labeling; (4) failure to inspect the dangerous waste storage area; and (5) failure to properly train personnel working with dangerous waste.</p> <p>Ecology has required a response to the first four violations within 30 days, and an immediate response to the fifth violation.</p> <p>On May 30, 1995, Ecology issued a formal Notice of Penalty Incurred and Due (No. DE 95NW-127) to RL and PNL, and assessed a \$7,000 fine (see entry below).</p> <p>RL/PNL provided a response to Ecology on June 2, 1995. Ecology asked for additional information, which was provided. On August 7, 1995, Ecology transmitted a letter to RL closing this action.</p> <p>Six violations of WAC 173-303 were identified as a result of the investigation. They are listed below.</p> <p>(1) Failure to confirm knowledge about a dangerous waste before treating, storing, or disposing of it (WAC 173-303-300).</p> <p>(2) Failure to provide a training program sufficient to ensure facility personnel can effectively respond to emergencies or to incorporate all dangerous waste management procedures relevant to their positions (WAC</p>
Hanford (WHC)	5/15/95	RCRA	Informal	Closed	Ecology	RL and WHC received a voluntary compliance letter from Ecology on May 15, 1995, that followed Ecology's investigation into the acceptance of labpack wastes into the Central Waste Complex (CWC).	

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							173-303-330).
							(3) Failure to incorporate in the contingency plan actions to be taken in the event a dangerous waste shipment arrives, is not acceptable, and cannot be transported (WAC 173-303-350).
							(4) Failure to submit a written report to Ecology within 15 days that emergency action was taken (WAC 173-303-360).
							(5) Failure to note significant discrepancies in the manifest, failure to submit a letter to Ecology within 15 days describing the discrepancies, and failure to take contingency plan actions (WAC 173-303-370).
							(6) Failure to locate dangerous waste within the facility or to cross- reference wastes by specific manifest numbers.
							Eight corrective measures and the dates to complete these measures were provided in the letter.
							On June 2, 1995, RL provided a response to Ecology that described the corrective actions completed to date and the remaining actions that will occur to close this item.
							On June 15, 1995, RL transmitted another letter to Ecology with more information. On July 12, 1995, WHC provided RL a letter to transmit to Ecology that stated RL and WHC

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							considered all corrective actions required by Ecology have been completed.
							On September 14, 1995, Ecology issued another compliance letter to RL and WHC, which stated that two corrective measures were not satisfactorily completed. The letter summarized the deficiencies with the corrective actions, and provided additional corrective actions that needed to be completed for the state to be satisfied with the closure of this item. Ecology said in its letter that RL and WHC had 15 days to complete the requirements in the letter, and that a response was required within 30 days.
							On September 20, 1995, Ecology issued a letter to RL and WHC that extended the above 15-day response requirement to 30 days. On October 26, 1995, Ecology transmitted a letter to RL and WHC stating they were satisfied with RL's response to the required corrective measures, and stated this inspection was now closed.
Hanford (PNL)	5/30/95	RCRA	Formal	Closed	Ecology	On May 30, 1995, Ecology issued a Notice of Penalty Incurred and Due (No. DE 95NW-127) against RL and PNL after a pressurized drum was improperly opened and damaged the facility, caused worker contamination, and released radioactive material.	This incident is described above under the entry dated May 3, 1995.
Hanford (WHC)	6/05/95	CAA	Informal	Open	DOH	DOH issued a compliance letter on June 5, 1995, that followed an inspection at the Central Waste Complex.	On August 7, 1995, Ecology transmitted a letter to RL closing this action.
							One finding was identified. DOH said in their compliance letter that some drums stored at the Central Waste Complex used drum lids containing an activated charcoal filter, which allows a gas exchange. These drums are

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							not considered sealed sources. The facility needed to obtain a Notice of Construction (NOC) permit before construction in order to store drums that are not sealed sources. The letter required a response in 60 days.
Hanford (WHC)	7/13/95	RCRA	Informal	Open	Ecology	Ecology issued a letter to DOE stating that DOE is in violation of the TPA and RCW 70.105.	On July 12, 1995, a response was provided to DOH that stated the NOC would be prepared and provided to DOH by August 31, 1995. DOH approved the NOC on October 24, 1995. No formal notice of closure has been received from DOH to close this inspection. The letter stated that Ecology was considering formal enforcement action.
Hanford (PNL)	7/27/95	CAA	Informal	Open	DOH	DOH issued a Notice of Correction to RL that stated RL was not in compliance with WAC 246-247. DOH stated that RL was required to obtain a Notice of Construction (NOC) permit and department approval for emission unit modifications, which was not done before efforts to decontaminate the B Cell at the 324 Building began.	On July 20, 1995, RL responded to Ecology in a letter that stated "there are several problems and inaccuracies in these allegations," and explained where RL believed Ecology was inaccurate. The letter requires RL to submit to DOH an Assurance of Discontinuance of all work at the 324 Building. DOH said in the letter they will take enforcement action if the terms of the letter are not met.
Hanford (WHC)	7/31/95	CAA	Informal	Open	DOH	DOH issued a compliance letter following an inspection on May 31, 1995, that was intended to close out previous audit findings, and another inspection on July 13, 1995, when the inspectors returned and the problems still had not been corrected.	The inspectors identified monitoring instrumentation that was not calibrated, had out-of-date calibration stickers, or had incorrect or missing calibration stickers. The letter states "This has been a recurring problem since the inception of our regulatory inspection program. Failure to verify

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							calibration of equipment calls into question the accuracy of data used in offsite dose calculations."
							The letter stated that RL needs to develop a corrective action plan by October 2, 1995, to correct the problems with calibration. After that date, DOH inspectors will randomly verify that air monitoring and indication equipment is in calibration and marked accordingly.
Hanford (ERC)	9/21/95	CAA	Informal	Open	DOH	DOH transmitted a compliance letter to RL on September 21, 1995, that followed an inspection at 100 N Basin and 1303 N silos. The letter identified one finding and two BMPs.	The finding stated that the current laboratory inventory control program was inadequate to correlate the air monitoring values with the quantity of activity processed in the hoods during the sampling period. DOH is requesting a response by December 1, 1995.
Hanford (ERC)	10/04/95	RCRA	Informal	Open	Ecology	Ecology issued a voluntary compliance letter to BNL on October 4, 1995, for accumulating hazardous waste longer than the allowed 90-day storage period at the 183-H solar evaporation basins.	This voluntary compliance letter followed an incident in which one of the drums containing 183-H basin waste blew its lid off while the drum was being opened at T Plant for verification prior to entering storage. As a result, all the drums of waste that had been collected from the basins were returned back to the basins, which then caused the waste to be accumulated greater than the 90 days allowed by the regulations.
Hanford (LRC)	10/13/95	CWA	Informal	Open	DOH	The DOH's Department of Drinking Water issued a Notice of Violation to RL for operating the 100 Area water system without certified operators.	RCW 70.119 requires certified water works operators responsible for the active daily technical operation of the water system. The

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Enforcement Actions

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Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
							letter required a response within 30 days of the letter.

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